PB-230 710

POLLUTION OF THE INTERSTATE WATERS OF PERDIDO BAY AND ITS TRIBUTARIES - FLORIDA AND ALABAMA. PROGRESS MEETING HELD AT GULF BREEZE, FLORIDA ON JANUARY 26-27, 1972. TRANSCRIPT OF PROCEEDINGS

Environmental Protection Agency
Atlanta, Georgia

27 January 1972

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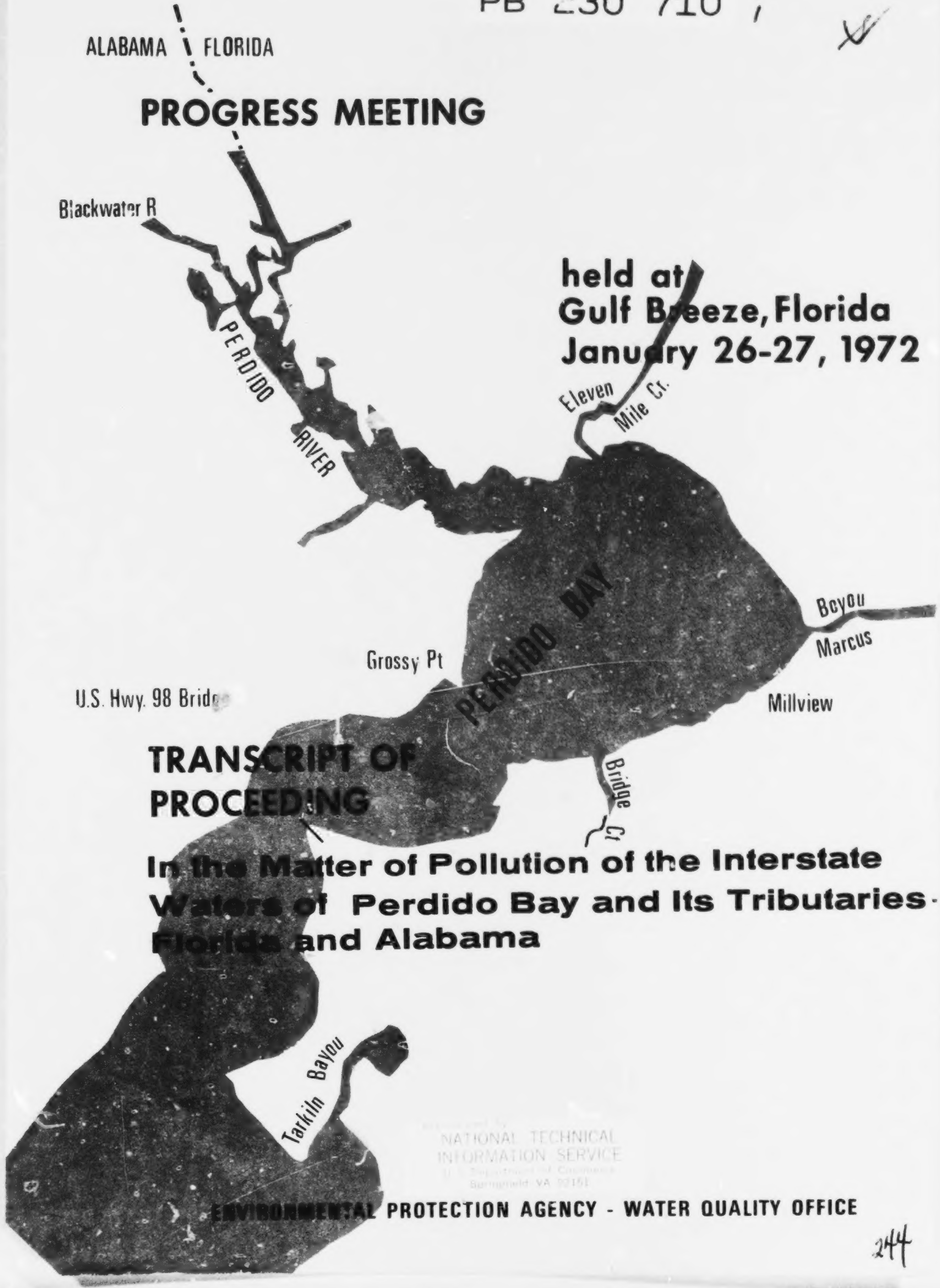
PROGRESS MEETING

held at
Gulf Breeze, Florida
January 26-27, 1972

TRANSCRIPT OF PROCEEDING

In the Matter of Pollution of the Interstate Waters of Perdido Bay and Its Tributaries - Florida and Alabama


ALABAMA
FLORIDA
Blackwater R
PERDIDO RIVER
Eleven Mile Cr.
PERDIDO BAY
Bayou Marcus
Grossy Pt
U.S. Hwy. 98 Bridge
Millview
Bridge Cr
Tarkiln Bayou

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ENVIRONMENTAL PROTECTION AGENCY - WATER QUALITY OFFICE

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PROGRESS MEETING

IN THE MATTER OF
POLLUTION OF THE
INTERSTATE WATERS OF PERDIDO BAY

held at

Gulf Breeze, Florida

January 26-27, 1972

TRANSCRIPT OF PROCEEDINGS

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A progress meeting in the matter of pollution of the interstate waters of Perdido Bay convened at 9:30 o'clock on January 26, 1972, at the Holiday Inn, Gulf Breeze, Florida.

[illegible] statements [illegible] and
recommendations on: [illegible]
[illegible] in Perdido Bay;
[illegible]
[illegible] information

PRESIDING:

John C. White
Director, Enforcement Division
Region IV
U. S. Environmental Protection Agency
Atlanta, Georgia

CONFEREES:

Jack E. Ravan
Regional Administrator
Region IV
U. S. Environmental Protection Agency
Atlanta, Georgia

Paul J. Traina
Acting Director, Water Programs Branch
Region IV
U. S. Environmental Protection Agency
Atlanta, Georgia

J. L. Crockett, Jr.
Director, Technical Staff
Alabama Water Improvement Commission
Montgomery, Alabama

David Levin
Chairman, Florida Department
of Pollution Control
Tallahassee, Florida

C. Gilbert Mauriello
Director, Division of Operations
Florida Department of Pollution Control
Tallahassee, Florida

PARTICIPANTS:

Billy H. Adams, Chief
Engineering Services Branch
Surveillance and Analysis Division
U. S. Environmental Protection Agency
Athens, Georgia

Mrs. Jo Ann Allen
Star Route, Box 605
Lillian, Alabama

Clinton G. Bell
President, Local 447
International Brotherhood of Pulp
Sulphite & Paper Mill Workers
St. Regis Paper Company
Cantonment, Florida
John M. Bolton
Assistant Director
Alabama Water Improvement Commission
Montgomery, Alabama

Richard Cashen
Corporate Engineering
St. Regis Paper Company
Jacksonville, Florida

Jose F. deCastro, Chief
Bureau of Enforcement
Florida Department of
Pollution Control, Tallahassee, Florida

P. J. Doherty
Regional Engineer
Florida Department of Pollution Control
Gulf Breeze, Florida

H. Ross Emery
Manager-Engineering Services
St. Regis Paper Company
Jacksonville, Florida

Mrs. J. J. Guice
United Citizens Against Pollution
Gulf Breeze, Florida

PARTICIPANTS (Continued):

Edgar A. Hughes, Marine Biologist
Alabama Department of Conservation and
Natural Resources, Marine Resources Division
Dauphin Island, Alabama

Russell T. Hudson
Resident Manager
St. Regis Paper Company
Cantonment, Florida

Daniel F. Krumel
Executive Director
Escambia-Santa Rosa Regional
Planning Council

Roy L. Miller, Manager
Research & Development
St. Regis Paper Company
Cantonment, Florida

William Spriggs
Director of Public Utilities
City of Pensacola, Florida

Medie T. Still
Technical Superintendent
St. Regis Paper Company
Cantonment, Florida

Harry W. Thompson
Perdido Bay Antipollution Association
Lillian, Alabama

Roland Walker, Sr.
Orange Beach Fishing Association
Orange Beach, Alabama

- -

OTHERS IN ATTENDANCE

Newton Barnes
Vice-President
Local 447, Route 3
Cantonment, Florida

G.S. Peter Bergen
Le Boeuf, Lamb, Leiby & MacRag
Attorneys
One Chase Manhattan Plaza
New York, New York

Herbert F. Berger
Regional Engineer
National Council Air & Stream
Improvement
Box 14483
Gainesville, Florida

Mrs. Frank C. Bozeman
122 W. Lloyd
Pensacola, Florida

J.D. Brown
Bream Fisherman's Association
400 Colbert Avenue
Warrington, Florida

Willard E. Carlson
1873 Woodleigh Drive, W.
Jacksonville, Florida

Fayette Dennison, President
West Florida Utilities Inc.
3190 Navy Blvd.
Pensacola, Florida

W. de la Rea
Plant Manager
Tenneco
Bay Minette, Alabama

John Fay
Container Corp. of America
Box 709
Brewton, Alabama

W.F. Fillingim, President
Local Union #444
Route 1, Box 155 J
McDavid, Florida

Mrs. Robert L. Gade
Conservation Chairman
Frances Weston Audubon Society
& Diggers Garden Club
Route 1, Box 791
Pensacola, Florida

Earl R. Gard, Jr.
Box 474
Perdido Beach, Alabama

Garrett Griggs
Box 115
Orange Beach, Alabama

George L. Harlow
Chief, Enforcement Branch
Enforcement Division
Environmental Protection Agency
Region IV
1421 Peachtree Street, N.E.
Atlanta, Georgia

Leroy E. Healy, President
F.M. Weston Audubon Society
Pensacola, Florida

Mrs. Jean F. Hern
Legislative Chairman
American Association of
University Women
100 Adkinson Drive
Pensacola, Florida

John Herndon, Chairman
Local 737 - Labor
533 E. Roycast
Pensacola, Florida

LCDR C.R. Hindrichs
Captain of the Port & Group
Commander
U.S. Coast Guard Base
Mobile, Alabama

W.H. Howard
Regional Chemist
Florida Department of Pollution Control
1384 Shoreline Drive
Gulf Breeze, Florida

Larry Johnson
Fishery Biologist
Alabama Department of Conservation
Box 504
Fairhope, Alabama

J.P. Krumbein
Technical Director
Tenneco Chemicals, Inc.
Box 911
Pensacola, Florida

Herbert J. Koelling
Box 202
Perdido Beach, Alabama

Mrs. Herbert J. Koelling
Box 202
Perdido Beach, Alabama

David Lang
Container Corp. of America
Box 709
Brewton, Alabama

Woodrow L. Lynn
Head of Engineering Department
Navy Public Works Center
Naval Air Station, Bldg. 1
Pensacola, Florida

J.E. Mattis
F.M. Weston Audubon Society
Route 3 Box 358
Pensacola, Florida

Mrs. E.R. Moffett
Route 7, Box 446
Pensacola, Florida

Oscar N. Mosley, President
Local 561, International Papermakers
2806 East Brainerd Street
Pensacola, Florida

James M. Murray
Route 2, Box 304
Pensacola, Florida

Ralph Pellizzeli
Vice-President, 447 - Labor
Route 1, Box 39
Cantonment, Florida

A.W. Perkins, Jr. President
L.U. 1937, I.B.E.W.
120 Pace Parkway
Cantonment, Florida

S. Keeple Pratt
General Manager of Manufacturing
St. Regis Paper Company
2400 Gulf Life Tower
Jacksonville, Florida

Robert E. Ratcliff
Manager of Engineering
Henningson, Durham, Richardson & Hart
Box 1641
Pensacola, Florida

Mrs. Ernest Rentz
Lillian, Alabama

D.N. Robbins, Secretary
Joint Locals Committee
Box 603
Cantonment, Florida

W.E. Rodak
Union President
St. Regis Paper Company
Cantonment, Florida

Mrs. E.O. Sanders
4140 Iris Court
Pensacola, Florida

James H. Sargent
Enforcement Specialist
Environmental Protection Agency
1421 Peachtree St., N.E.
Atlanta, Georgia

D.R. Spell
Environmental Protection Officer
Southern Division
Naval Facilities Engineering Command
2144 Melbourne Street
Charleston, South Carolina

Maynard Stitt
St. Regis Paper Company
Box 1591
Pensacola, Florida

W.T. Taylor
Box 400
Molino, Florida

W.C. Timpe
Project Leader
St. Regis Paper Company
4160 Piedmont Road
Pensacola, Florida

Paul Trout
Environmental Director
Container Corp. of America
Box 709
Brewton, Alabama

Thomas D. Walker
Agency Coordinator
Coastal Coordinating Council
Room 682, Larson Building
Tallahassee, Florida

R.S. Welch, Vice-President
Engineering
St. Regis Paper Company
Gulf Life Tower
Jacksonville, Florida

Frank Westmark
District Manager
Public Relations
St. Regis Paper Company
Box 1591
Pensacola, Florida

PROCEEDINGS

OPENING STATEMENT

BY

MR. JOHN C. WHITE

MR. WHITE: The meeting is open.

This meeting to consider the progress being made toward achievement of recommendations developed at the first and second sessions of the conference in the matter of pollution of the interstate waters of the Perdido Bay and its tributaries in Florida and Alabama is being held under the provisions of Section 10 of the Federal Water Pollution Control Act as amended.

Under the provisions of the Act, the Administrator of the Environmental Protection Agency is authorized to call a conference when requested to do so by the Governor of a State. On the basis of a written request from the Honorable Albert P. Brewer, former Governor of Alabama, dated December 22, 1969, the Secretary of the Interior called a conference to consider pollution in the interstate and navigable waters of Perdido Bay. The first conference was held January 22, 1970, in Gulf Breeze, Florida. The second session of the conference was held on February 25-26, 1971, at the Municipal Auditorium in Pensacola, Florida.

Opening Statement - Mr. White

As specified in Section 10 of the Act, the Florida Department of Pollution Control and the Alabama Water Improvement Commission have been notified of this progress meeting.

As was noted at the first and second sessions of the conference, both the State and Federal Governments have responsibilities in dealing with water pollution control problems. The Federal Water Pollution Control Act declares that the States have primary rights and responsibilities for taking action to abate and control pollution.

At the same time, the Administrator of the Environmental Protection Agency is charged by law with specific responsibilities in the field of water pollution control in connection with the pollution of interstate and navigable waters. The Federal Water Pollution Control Act provides that pollution of interstate or navigable waters which endangers the health or welfare of any persons shall be subject to abatement. This applies whether the matter causing or contributing to the pollution is discharged directly into such waters or reaches such waters after discharge into a tributary.

The purpose of the meeting is to bring together the State water pollution control agencies, representatives of the Environmental Protection Agency, and other interested parties to review the existing situation and the progress which has been made toward meeting previous conference recommendations. This meeting differs from the previous ones in that it is not mandatory that a summary be prepared. The conferees have the option, however, of developing revised recommendations if they feel that it is warranted by conditions which exist today. Should this prove necessary, the State, localities, and industries will be given an opportunity to take any indicated remedial action under approved State and local laws.

The Florida Department of Pollution Control will be represented by Mr. David Levin and his designee, Mr. Gil Mauriello.

The Alabama Water Improvement Commission will be represented by Mr. Joe Crockett.

The Federal representative is Mr. Paul Traina, Acting Director, Water Programs Branch, Southeast Region, Environmental Protection Agency.

My name is John C. White. I am from the Atlanta Regional Office of the Environmental Protection Agency and have been designated Chairman by Mr. Ruckelshaus.

The parties to this meeting are the official State water pollution control agencies and the Environmental Protection Agency. Participation will be open to representatives and invitees of these agencies and such persons as inform me that they wish to present statements. However, only the representatives of the Florida Department of Pollution Control, the Alabama Water Improvement Commission, and the Environmental Protection Agency constitute the conferees.

At the second conference session, the conferees unanimously recommended a program for necessary action. The recommendations of the conferees are as follows:

Preamble to the recommendations: Based on the evidence presented at the second session of the Perdido Bay enforcement conference, the following waste abatement water quality management program is recommended to abate the existing pollution in Perdido River and Bay.

1. St. Regis Paper Company of Cantonment, Florida, shall reduce by June 1, 1971, 5-day BOD generated within the plant to a level not to exceed 51,000 pounds per day. Particular attention shall be paid to tall oil and other recovery processes. If this reduction cannot be met by June 1, 1971, the company shall reduce plant reduction levels as necessary.

2. The St. Regis Paper Company shall by June 1, 1971, materially remove the foam-causing constituents from its waste discharge so that unaesthetic foaming in Perdido Bay is eliminated. The companies shall report to the conferees monthly beginning April 1, 1971, on the methods being utilized

to accomplish this objective.

3. St. Regis Paper Company shall not discharge more than 5,100 pounds per day of 5-day BOD to Eleven Mile Creek at the completion of construction of waste abatement facilities scheduled for and in no event later than October 31, 1971. If further investigation shows that this limit is excessive, St. Regis Paper Company will be required to further reduce its waste effluent discharge. There shall be a maximum feasible reduction of carbonaceous organic materials. The St. Regis Paper Company shall monitor its effluent to measure these reductions, conduct a feasibility study and submit a plan of abatement for carbonaceous wastes to the conferees by February 15, 1972.

4. St. Regis Paper Company shall reduce the color of its waste discharge to meet the water quality standards of Florida, Alabama, and the Federal Government. St. Regis Paper Company shall report to the conferees by February 15, 1972, its findings on methods for removing color from its waste discharge.

5. St. Regis Paper Company shall submit a report to the conferees by February 15, 1972, on the application of the present water renovation research project to the Cantonment mill.

6. The progress toward consolidation of sewage treatment plants on Bayou Marcus has not been satisfactory. The Escambia-Santa Rosa Planning Council shall submit to the State of Florida by April 15, 1971, a satisfactory plan for accomplishing the consolidation of the Bayou Marcus sewage treatment plants.

7. No further construction dredging shall be permitted in Perdido Bay until a master plan for development of the shoreline has been prepared and approved by the States of Florida and Alabama,respectively. Maintenance dredging of existing channel shall be by pipeline or by hopper dredge. Disposal of all dredge materials from hydraulic dredging shall be to upland spoil sites. The Corps of Engineers is requested to provide the conferees with a listing of these sites.

Now a word about procedures.

The conferees will be called upon to make statements. The conferees in addition may call upon participants whom they invited to attend the meeting. In addition we shall call on other interested individuals who have indicated they wish to present statements. At the conclusion of each statement the conferees will be given an opportunity to comment or ask questions.

In order to carry on an orderly meeting we do not permit questions or comments from the floor. If you have any questions or comments, please save them until you come to the podium and address the conferees.

Everyone will be given a full opportunity to present anything that is relevant for the consideration of the conferees.

At the end of all the statements we shall have a discussion among the conferees and try to arrive at a basis of an agreement on the facts which have been presented. Then if it is deemed necessary, we shall go into a brief executive session. Following the session the conferees will announce their revised conclusions and recommendations which have been dictated by the facts as they appear today. Again, however, I will point out that it is not mandatory that new conclusions and recommendations be developed.

Should new conclusions and recommendations be developed, they do not have any basis in law until they are adopted by the Administrator of the Environmental Protection Agency.

A record and verbatim transcript of the meeting is being made by Mrs. Virginia Rankin. This is being made for the purpose of providing a complete record. Although the registration cards indicate that copies of the transcript will come out in printed form, this will not be true unless new conclusions and recommendations are developed.

I would like to point out, again, this is something of a tenuous situation because we are here primarily to ascertain what progress has been made by those cited at the previous conferences. If we don't come out with new conclusions and recommendations, a copy of the transcript will be made available locally and at the State agencies and in Atlanta for inspection of anybody who wishes to review it. Otherwise, as I stated, if we do develop new conclusions and recommendations we will get a printed transcript out.

Under any circumstance, if there is any material presented that you feel that you would like to have immediately, you can make your arrangements with Mrs. Rankin, who is an independent contractor in this matter.

Before getting on into the meeting, I would like to ask each of you who plan to make a statement to come up to the podium and clearly identify yourselves for Mrs. Rankin and for the record.

Now I would like to call on the conferees to see if they have any opening statement or comment.

Then we will proceed with the Federal presentation. I will call on Mr. Traina.

PAUL J. TRAINA, ACTING DIRECTOR
WATER PROGRAMS BRANCH, REGION IV
ENVIRONMENTAL PROTECTION AGENCY
ATLANTA, GEORGIA

MR. TRAINA: Mr. Chairman, we do not have a presentation to make at this time. However, our technical staff is here, EPA's technical staff is here, and they can participate or answer any questions that may come up during the session.

I do not have any indication of any other Federal agency that is here that wants to make a statement.

Can I ask if anyone is here from another Federal agency who would like to make a statement?

If not, sir, the Federal presentation is concluded.

MR. WHITE: Well, I am sure, Mr. Traina, that we are going to have probably some questions that maybe the technical staff will have to answer.

MR. TRAINA: The staff is here to answer any questions.

MR. WHITE: And please be assured that I think Mr. Traina is fully prepared to explore any problems or questions that you might bring up.

We will now proceed with the State's presentation and we plan to go with the State of Alabama first and then follow with the State of Florida.

I will now call on Mr. Joe Crockett for the Alabama presentation.

J. L. CROCKETT, JR.
DIRECTOR, TECHNICAL STAFF
ALABAMA WATER IMPROVEMENT COMMISSION
MONTGOMERY, ALABAMA

MR. CROCKETT: Mr. John M. Bolton, Assistant Director, Alabama Water Improvement Commission, will submit a statement on behalf of the Alabama Water Improvement Commission.

JOHN M. BOLTON
ASSISTANT DIRECTOR
ALABAMA WATER IMPROVEMENT COMMISSION
MONTGOMERY, ALABAMA

MR. BOLTON: Mr. Chairman, conferees, ladies and gentlemen. My name is John Bolton and I am a member of the staff of the Alabama Water Improvement Commission.

The first session of the conference in the matter of pollution of the interstate waters of Perdido Bay and its tributaries was held on January 22, 1970, at the request of the

Governor of the State of Alabama. Following the conference, the conferees identified two major sources of pollution as affecting the water quality of Perdido Bay and adopted recommendations designed to correct these problems. One included the consolidation of several sewage treatment plants located in the vicinity of Bayou Marcus. The second and the most significant source of pollution identified and to which specific recommendations were directed following the first session of the conference was St. Regis Paper Company at Cantonment, Florida.

Following the second session of the Perdido Bay enforcement conference which was held here in Pensacola on February 25-26, 1971, the conferees again identified the significant contributors of pollution to Perdido Bay as being several Bayou Marcus sewage treatment plants and the St. Regis Paper Company. Consolidation of the Bayou Marcus sewage treatment plants was again included in the recommendations and further reductions in the quantity of pollution discharged by St. Regis Paper Company were specified. We shall be looking forward today toward receiving a satisfactory status report regarding the consolidation of the Bayou Marcus treatment facilities as recommended by the conferees. If this report is not satisfactory, we trust that affirmative action will be taken by the conferees here today.

During 1971, the citizens of Alabama who have been concerned with pollution of Perdido Bay by St. Regis Paper Company have been encouraged by reports of the reduction of oxygen-consuming materials as the result of in-plant process changes. We have also been encouraged by an announcement in late October 1971 that secondary treatment facilities were completed and placed into operation at that time by St. Regis. Nevertheless, I must inform the conferees today that we continue to receive complaints from responsible citizens regarding water quality in Perdido Bay. For the most part, the complaints registered with the Commission have been connected with the presence of excessive quantities of foam and color in the Bay. I would like to call your attention to the fact that the 1971 conference specified that St. Regis submit a progress report on color removal to this conference by February 15, 1972.

At this point, I would like to submit to the conferees two photographs taken early this month by a Perdido Bay property owner which were handed to the Commission staff for this purpose. I realize that photographs cannot be incorporated in the official record but it is requested that they be included in the Environmental Protection Agency's permanent file relating to this conference and reference made to them in the transcript of the conference.

MR. WHITE: They will be accepted into the official record.

(The above-mentioned Exhibit, marked Exhibit 1, is on file at the office of the Environmental Protection Agency, Region IV, Atlanta, Georgia.)

MR. BOLTON: I also have in hand two letters which have been directed to the Commission by property owners of Perdido Bay regarding recent observations of the bay during which excessive foam was observed. Upon the conclusion of my presentation, I would like to read these letters into the record at the request of those who prepared them.

In our statement during the preceding conference involving Escambia River and Bay, we commented favorably upon the value and usefulness of the study of wastewater treatment facilities conducted by the EPA at Container Corporation of America's Brewton, Alabama, mill in June of 1971. Consistent with our comments regarding the value of EPA's study of the Brewton mill's wastewater treatment facilities, we at this time would like to respectively request that a similar study be conducted over a comparable period of time of the St. Regis treatment facility. Such an in-depth study would seem to serve as documentation as to whether or not the treatment facilities are performing in accordance with the recommendations adopted by the conference following the 1971 conference. It would be expected that the study be conducted no later than July 1 of this year.

At this time I would like to read into the record two letters filed with the Commission by citizens of the State of Alabama regarding the matter at hand.

MR. WHITE: Please proceed, Mr. Bolton.

MR. BOLTON: The first letter is from Mr. Albert P. Elebash, who is a resident of Montgomery, Alabama, and who I understand owns property on Perdido Bay.

(The following letter was read by Mr. Bolton:)

Albert P. Elebash
P. O. BOX 131
MONTGOMERY, ALABAMA 36101

January 20, 1972

Mr. John Bolton
Alabama Water Improvement Commission
State of Alabama
Montgomery, Alabama

Dear Mr. Bolton:

Attached are prints of snapshots taken in front of my home on Perdido Bay, Alabama, near the mouth of Soldier Creek on January 9th (approximately), 1972.

As you will note, we are still having large accumulations of foam under certain wind and weather conditions. It doesn't show up in the photographs but there are flecks of foam all over the bay on a day like this. These foam flecks are not the usual spindrift that dissipates quickly, but are indicative of "dirty" water. They remain for long periods of time before dissipating.

I sincerely hope that St. Regis Paper Company will meet all of the requirements set forth by the various Conferences on Pollution, and frankly, I would sincerely hope that they might do much better than this in order to improve their public image.

Many thanks.

Very truly yours,

Albert P. Elebash

APE:dsm

Attachments

MR. BOLTON: The second letter is from Mr. Paul Corwin. He is also from Montgomery and I understand he owns property on Perdido Bay.

(The following letter was read by Mr. Bolton:)

PAUL CORWIN AGENCY INC
[illegible] UNION BANK TOWER
MONTGOMERY, ALABAMA

January 20, 1972

Mr. John Bolton
Alabama Water Improvement Commission
Montgomery, Alabama

Dear Mr. Bolton:

I have discussed with other members of the Board of Directors of the Perdido Bay Anti-Pollution Committee the meeting which will be held in Pensacola on next Wednesday, January 26th, to receive reports on progress made by St. Regis Paper Company in complying with regulations set forth at previous conferences. It appears that those of us who live in Montgomery and Selma have other commitments on that date and it is doubtful if either Mr. Edgar Stuart, Mr. Albert Elebash, Mr. Harry Gamble or this writer will be able to attend this conference. It is anticipated, however, that we will have representatives of our group who live in Baldwin County attend this meeting for the purpose of making a statement.

I am very much disturbed at the apparent lack of progress made by St. Regis in correcting pollution of Perdido Bay, principally in the foaming which continues to be present in both Perdido Bay and Soldiers Creek. My lot fronts on Perdido Bay and runs back through to Crystal Lake which is a part of Soldiers Creek. I did not go to Perdido Bay between Thanksgiving and last weekend, but I am told by persons who have been there in this period of time that the foaming continues. I know that foam was in Perdido Bay during Thanksgiving weekend, and on Friday, January 14th, foam was beginning to build up in Soldiers Creek and Crystal Lake and on Saturday had built up at my boathouse at least 10 to 12 inches high and 15 to 20 inches deep. This foam was still in Crystal Lake and Soldiers Creek when I left Sunday afternoon about 4:00.

During last weekend, I went to Pensacola across Lillian Bridge and the foam was in great abundance in Pensacola Bay on both sides of Lillian Bridge.

It seems that we have been pleading with St. Regis for six to eight years to do something about this condition and abate the pollution before they kill Perdido Bay. I can say as a layman, I have not detected any results of our efforts or the efforts of the Environmental Protection Agency and the Alabama Water Improvement Commission.

Whatever they are doing apparently is wrong, and I certainly hope that you will present my statement for me at this meeting, and if possible, file a copy of this letter.

Escambia Bay and Pensacola Bay appear to be dead. Surely, we can take a lesson from what has happened there and save Perdido Bay.

Your fine efforts on behalf of the citizens of Alabama are appreciated.

Very truly yours,

PERDIDO BAY ANTI-POLLUTION COMMITTEE

Paul Corwin

PC/dp

MR. BOLTON: Gentlemen, we have made a recommendation in the statement here that an in-depth study extending over a period of two weeks be conducted of the treatment facilities of St. Regis comparable to that conducted at Container Corporation. I trust that you will give consideration to this during your deliberations.

We are also looking forward to affirmative action on the part of corrective action in the way of consolidation of the Bayou Marcus sewage treatment plant.

MR. WHITE: Thank you, Mr. Bolton.

Comments or questions?

If not, please proceed, Mr. Crockett.

MR. CROCKETT: Mr. Harry W. Thompson, representing the Perdido Bay Antipollution Association.

Mr. Thompson is from Lillian, Alabama.

HARRY W. THOMPSON
PERDIDO BAY ANTIPOLLUTION ASSOCIATION
LILLIAN, ALABAMA

MR. THOMPSON: I am Harry W. Thompson from Lillian, Alabama.

I want to concur with the remarks made by Mr. Bolton. I am in complete accord with what the gentlemen said in the letters that he gave to you.

Some 4-1/2 years ago I started working on trying to get the pollution in Perdido Bay abated. About 2-1/2 years ago a group of us met with some officials of St. Regis Paper Company and asked what they would do about the situation and they told us that they were complying with the law. And we complained of the foam and they said, well, you let us know when it is going to be foamy out there and we will collect some samples and we will see if we are doing this thing.

This was done and they reported back to us prior to the Federal conference, the first Federal conference, and told us that this was a benign substance and that the paper mill had nothing to do with it.

The same report was made at the conference, that it was a benign substance, and Mr. Henry Fales, the manager, was called down by Mr. Murray Stein, who told him that paper mills did make this kind of effluent.

Corrective measures have been made, we have been told, and we have seen pictures of settling ponds and we have been told about the enormous amounts of money that St. Regis has spent in trying to correct the situation, and we have been told that they were going to do better, but I can't see where it has done any better and I resent being told one thing and finding out that there is another.

I feel that somebody should be able to make these corrective measures stick or else they should see about closing down this facility. It appears that either the St. Regis plant is so old that they can't fix it and that they need to build a new one and they are going to ride that thing out until such time as we make them close up any building of the plant, and I suggest that they start working on building a new plant and remove this one.

Thank you.

MR. WHITE: Thank you, Mr. Thompson.

Are there any comments or questions?

MR. CROCKETT: I have one question, Mr. Thompson.

MR. WHITE: Mr. Crockett. If you would, would you stand back up, Mr. Thompson.

MR. THOMPSON: Yes, sir.

MR. CROCKETT: Mr. Thompson, are the members of the Perdido Bay Antipollution Association restricted to Alabama? Are they all Alabama citizens or are there Florida citizens within this association?

MR. THOMPSON: There is no restriction and there are Florida citizens. I happen to be a Florida citizen and an Alabama property owner.

MR. BOLTON: Other States too?

MR. THOMPSON: Yes, sir, anybody can be a member of the association that is interested in abating pollution in Perdido Bay.

MR. CROCKETT: My reason for asking the question is to find out whether the complaints on foam are simply restricted to Alabama people or if there are residents of Florida along the shores of Perdido Bay who are suffering from the same situation. And thank you for your comments.

MR. THOMPSON: Thank you.

MR. WHITE: Please proceed, Mr. Crockett.

MR. CROCKETT: Mr. Edgar Hughes, Marine Biologist, with the Alabama Department of Conservation, Marine Resources Division, Dauphin Island, Alabama.

EDGAR A. HUGHES, MARINE BIOLOGIST
ALABAMA DEPARTMENT OF CONSERVATION AND NATURAL RESOURCES, MARINE RESOURCES DIVISION
DAUPHIN ISLAND, ALABAMA

MR. HUGHES: Mr. Chairman, ladies and gentlemen.

I am Edgar Hughes, Marine Biologist, Alabama Department of Conservation and Natural Resources, Marine Resources Division.

The Marine Resources Division has had representatives at the two previous conferences on the pollution of Perdido Bay. Our views concerning the pollution of the bay were presented by Mr. Johnie Crance at the public hearing on January 22, 1970, and by Mr. Wayne Swingle at the hearing on February 25, 1971.

Our views are still the same. At present, the situation is still deplorable, and dissolution of the problem still has not been achieved.

Marine animals continue to use this estuary as nursery grounds, and the citizens of the State of Alabama would like to continue to use the area as a means of earning their livelihood and enjoying the sports of boating, swimming, and sportsfishing. Without ending the pollution, neither man nor fish will likely be able to continue using the estuary.

The time for studying the problem is past. Waste abatement and water quality management must be instituted immediately by the industry discharging waste.

In closing, I should like to voice the hope that this conference will bring a true solution to the pollution problem on Perdido Bay.

Thank you for allowing us to again present our views on this problem. (Applause.)

MR. WHITE: Thank you, Mr. Hughes.

Are there comments or questions?

Thank you.

Mr. Crockett.

MR. CROCKETT: Mr. Roland Walker, Sr., representing the Orange Beach Fishing Association. Mr. Walker resides at Orange Beach, Alabama.

ROLAND WALKER, SR.
ORANGE BEACH FISHING ASSOCIATION
ORANGE BEACH, ALABAMA

MR. WALKER: Mr. Chairman, ladies and gentlemen.

I am a fisherman, not a speaker, but I am still very concerned about Perdido Bay. Even though it frightens me to try to talk about it before a large group, I just have a few things that I must say.

But first I would like to ask if the EPA has taken any kind of a study before this meeting such as they did back three years ago?

MR. WHITE: Mr. Traina will respond to that.

MR. TRAINA: Yes, sir, we did some effluent samplings of the mill I think it was in the spring of this past year. Is that right? I have the exact dates here.

MR. ADAMS: June.

MR. TRAINA: In June of 1971 we took effluent samples of the mill, St. Regis.

MR. WALKER: Thank you. Then there is no concrete evidence as to what the new abatement plant is supposed to be doing at the present time?

MR. TRAINA: We understand that since that time there have been facilities completed that we don't have information on, yes, sir, you are correct.

MR. WALKER: Thank you.

The reason I asked that question, I was talking to a friend of mine that lives on the north side of Perdido Bay and he told me that sometime during the summer he had made a remark to his wife that it looked like that things were really going good, that they were accomplishing what we had set out to have done, that the bay looked to be in much better condition. But he said about two weeks later that it was back to the same old thing. And during this time he happened to read in the Pensacola paper that the paper mill had cut down production 40 percent during this time that the water was looking so good. If 40 percent will make a difference, I am sure if they would do the 90 percent which was recommended as far as pollution abatement at St. Regis, we will all be happy.

We are quite concerned about the color and the foam of Perdido Bay, but nothing has been said about the bottoms of Perdido Bay. When I made a trip up into Eleven Mile Creek we found that there was about a 4-inch depth of a black or grayish substance on the bottom and when you punched through it with an oar you would get big bubbles of gases that would come up. What I am wondering is that if this material wouldn't have to be removed from Eleven Mile Creek and from the upper reaches of Perdido River before we can see much improvement. I hope this is not true. I hope it will correct itself when St. Regis discontinues some of this pollution.

Another thing that I would like to say, I get to take some of those people fishing and get some money from them, but in talking to one of the employees he says that this company is so big and they have so many other plants that this one on Perdido River doesn't mean that much to them. He says they threaten to lay off workers, but I don't worry about being laid off. I would like to see them clean up the mess. And we don't worry so much about seeing them having to close down if we can clean up the mess and then maybe we can start over.

But, gentlemen, I think we have waited about long enough to see some real, honest to goodness true evidence of an improvement.

Thank you very much. (Applause.)

MR. WHITE: Thank you, Mr. Walker.

Mr. Traina?

MR. TRAINA: No.

MR. WHITE: Mr. Crockett, let's proceed.

MR. CROCKETT: Mr. Chairman, that concludes the list of those who have advised me that they wish to speak.

MR. WHITE: This is off the record.

(Off the record.)

MR. WHITE: Let's go back on the record.

Mr. Thompson has indicated that he would like to come back to address a question to the conferees.

MR. THOMPSON: I would like to ask Mr. Traina if the Federal Government has any plans in the mill to take samples, since the new so-called abatement facilities have been installed up there,and to make a comparison of the results of last spring's samples that he mentioned a while ago that were taken and see what the difference actually is?

MR. TRAINA: At this point in time we are not. However, we just received a recommendation from the State of Alabama that we do an in-plant investigation, and as far as I am concerned I am willing to go with that and the conferees will have to decide that. But I have no objection to going in there and doing that kind of survey.

MR. WHITE: I would like to address that also.

Now, I think that the EPA personnel employees are charged with investigating all discharges and steps, interim steps, along in a company's program of compliance. Sometimes we can't get to them as rapidly as we would like. The personnel is spread rather thin. But in every case you may be assured that provisions will be made to check to see that there has been compliance ultimately with conference recommendations.

MR. THOMPSON: As the slogan goes, it is fun to be fooled, but it is more fun to know. (Laughter.)

MR. WHITE: Mr. Crockett.

MR. CROCKETT: What I would like to say in response to Mr. Thompson's comments is, as I understand it, this new treatment facility of St. Regis went into operation last October or sometime during that part of the year. With a new treatment facility, it usually takes a shakedown period, and this is why a check study, so to speak, as we have recommended be done, is really more reflective of what the facility will do if it is accomplished some few months, six to eight months, after the facility went into operation.

MR. WHITE: Any other comments or questions?

Do you have anyone else, Mr. Crockett?

MR. CROCKETT: Is there anyone in the audience who wishes to make a statement at this time and has not advised the Chairman?

Apparently not.

MR. WHITE: Thank you, Mr. Crockett.

We will now proceed with the Florida presentation.

MR. MAURIELLO: Mr. Chairman, if we could go off the record for just one moment, I would like to check the list of people that we have.

MR. WHITE: Let's go off the record.

(Off the record.)

MR. WHITE: Let's go back on the record.

C. GILBERT MAURIELLO
DIRECTOR, DIVISION OF OPERATIONS
FLORIDA DEPARTMENT OF POLLUTION CONTROL
TALLAHASSEE, FLORIDA

MR. MAURIELLO: Mr. Chairman, from the State of Florida we have two representatives from the State Pollution Control Department who wish to be entered into the record.

First the Chief of our Bureau of Enforcement, Mr. deCastro, who will cover the point of the enforcement action taken by the State of Florida.

JOSE F. DE CASTRO, CHIEF
BUREAU OF ENFORCEMENT
FLORIDA DEPARTMENT OF POLLUTION CONTROL
TALLAHASSEE, FLORIDA

MR. DE CASTRO: Mr. Chairman, ladies and gentlemen.

My name is J. F. deCastro. I am the Chief of the Bureau of Enforcement for the State of Florida, Department of Pollution Control.

Our involvement with St. Regis dates back to late 1967 when the Pensacola mill was cited and ordered to provide 90 percent minimum treatment to their liquid waste.

Subsequently, in January of 1970, the conference in the matter of Perdido Bay made certain recommendations to abate water pollution from this source.

Thereafter, in February 1971, the conference reconvened to appraise the progress and results of the abatement measures previously prescribed by the State of Florida and of the recommendations made by the conferees during the January 1970 session of the conference.

The following summary encompasses measures for corrective action prescribed St. Regis Paper Company as the result of State action and recommendations made at the first and second sessions of the Federal-Interstate enforcement conference.

J. F. deCastro

I will not repeat the ones that Mr. White pointed out. I will just refer to our Number One item, that reads:

> Respondent shall take immediate measures to ensure that its waste treatment system will be physically capable of withstanding runoff resulting from heavy rainfall which can be reasonably anticipated.

It goes on providing 51,000 pounds of raw generated BOD and the 5,100 actually discharged to Eleven Mile Creek.

It also has the following item:

> Respondent shall file with the Department monthly a sample and monitoring record setting forth the daily levels and monthly average of the following parameters of the influent and effluent of the treatment system:
>
> Biochemical oxygen demand in parts per million and pounds per day.
>
> Settleable solids in parts per million and pounds per day.
>
> Carbonaceous matter in parts per million and pounds per day.
>
> Volume in million gallons per day.

And temperature of the effluent at the final discharge point only.

As far as the 51,000 pounds per day maximum of raw process generated BOD, our Northwest Regional Office jointly with the Environmental Protection Agency, St. Regis Paper Company, and independent laboratories have confirmed St. Regis compliance with the 51,000 pounds per day maximum raw BOD_5 within the plant, generated.

On August 10 the Environmental Protection Agency, Washington, had this release, of which I have a copy in my presentation:

> St. Regis cuts Florida Pollution.
>
> St. Regis Paper Company of Cantonment, Florida, largest single polluter of Perdido Bay near Pensacola, has complied with one phase of a "cut pollution or cut production" order issued by the Federal-State conferees in February, it was announced today by Administrator William D. Ruckelshaus of the Environmental Protection Agency.
>
> The Administrator said, "The Company is to be commended for putting forth extra effort in what was admittedly a stringent directive designed to clean up pollution in this beautiful bay."

J. F. deCastro

Ruckelshaus made his comments in approving the February enforcement conference summary, which includes the cleanup recommendations that the company has met. St. Regis, which has some 2,000 employees in the Cantonment operation, had been directed to reduce its daily untreated waste load from 78,000 to 51,000 pounds of biochemical oxygen demanding wastes by June 1 or cut production enough to accomplish it. A cooperative monitoring program, carried out by EPA, the State of Florida, and St. Regis technical staffs verified that the deadline had been met, Ruckelshaus said.

The plant discharges about 29 million gallons per day of wastewater in Eleven Mile Creek, a tributary of Perdido Bay, which the enforcement conferees said caused low dissolved oxygen in the bay as well as unsightly foam and excessive sludge deposits. Another phase of the enforcement order directs the company to reduce the BOD load by 90 percent by October 31. By that time, new treatment facilities are to have been installed by the plant, which should stop the foaming.

Now, our laboratory has reported a very recent sampling, about perhaps a week or ten days ago; as a matter of fact, on January 11 of 1972. And they only sampled the discharge at this time. The results show that St. Regis was discharging to Eleven Mile Creek 3,400 pounds of BOD_5. The settleable solids were in the neighborhood of 1.0 ppm, almost negligible. And that is as far as the 5,100 pounds per day, which I see that the EPA hasn't confirmed but we have lab results as recent as 1-11-72.

On January 13 of 1972, St. Regis Paper Company reported to EPA the completion of a 13-point major in-plant modification program primarily intended to reduce or eliminate foaming causing constituents from their discharges. Our regional office will continue and intensify the surveillance of the shores of Perdido Bay to appraise the results of this just recently completed program.

Reports from St. Regis Paper Company on their feasibility study to reduce carbonaceous matter and color from their liquid waste and on the application of their current water renovation research grant to the Pensacola mill area is due next February 15. However, we hope to hear from them shortly on the status of this project. This is just the objective case of St. Regis and I don't--I am sorry I didn't have any reports of this foaming problem before. This is the first I have heard about the foaming.

That concludes my presentation.

(The complete statement follows:)

STATE OF FLORIDA
DEPARTMENT OF POLLUTION CONTROL

FEDERAL ENFORCEMENT CONFERENCE
FLORIDA-ALABAMA
JANUARY 26, 1972

JOSE F. de CASTRO, CH.E., P.E.
CHIEF, BUREAU OF ENFORCEMENT

State involvement with St. Regis Paper Company dates back to late 1967 when the Pensacola facility was cited and ordered to provide 90% minimum treatment to their liquid waste.

Subsequently, in Jan. 1970, the Federal/Interstate Enforcement Conference in matters of Perdido Bay made certain recommendations to abate water pollution from this source.

Thereafter, in February 1971 the Enforcement Conference reconvened to appraise the progress and results of the abatement measures previously prescribed by the State of Florida in 1969, and of the recommendations made by the conferees during the January 1970 session of the conference.

The following summary encompasses measures for corrective action prescribed St. Regis Paper Company as the result of state action and recommendations made at the first and second sessions of the Federal/Interstate Enforcement Conference.

St. Regis Paper Company Case IW-116-67

1. Respondent shall take immediate measures to ensure that its waste treatment system will be physically capable of withstanding runoff resulting from heavy rainfall which can be reasonably anticipated.

2. Respondent shall reduce the five-day BOD generated within the plant to a level not to exceed 51,000 pounds a day on a monthly average. If this reduction cannot be met, the Company shall reduce plant production levels as necessary.

3. The Respondent shall immediately reduce or eliminate foam-causing constituents from its waste discharge so that unaesthetic foaming in Perdido Bay is eliminated. The Company shall report to the conferees with a copy to the Department on or before February 15, 1972, the methods being utilized to accomplish this foam constituent removal.

4. The Respondent shall not allow a discharge of more than 5,100 pounds a day of five-day BOD to Eleven Mile Creek. If further investigation shows that this amount degrades the water quality of Eleven Mile Creek, the Respondent will be required to further reduce its waste effluent discharge.

5. There shall be a maximum feasible reduction of carbonaceous organic materials. Respondent shall monitor effluent to measure these reductions and conduct a feasibility study and submit a plan of abatement for carbonaceous wastes to the conferees with a copy to the Department on or before February 15, 1972.

6 The Respondent shall reduce the color of its waste discharges to meet the applicable water quality standards. The Respondent shall report to the conferees with a copy to the Department on or before February 15, 1972, its findings on methods for removing color from its waste discharges.

7. The Respondent shall submit a report to the conferees with a copy to the Department on or before February 15, 1972, on the application of the present water renovation research project to the Cantonment mill.

8. The Respondent shall remove virtually all settleable solids from its effluent prior to discharge to Eleven Mile Creek not later than December 31, 1972.

9. Respondent shall install as soon as possible but not later than June 31, 1972, an approved graphical flow recorder and continuous sampling equipment to monitor the final treated effluent at the discharge point to Eleven Mile Creek. As an interim temporary measure Respondent shall install as soon as possible a provisional sampler and flow measuring device.

10. Respondent shall file with the Department monthly a sample and monitoring record setting forth the daily levels and monthly average of the following parameters of the influent and effluent of the treatment system:

--Biochemical oxygen demand in parts per million and pounds per day

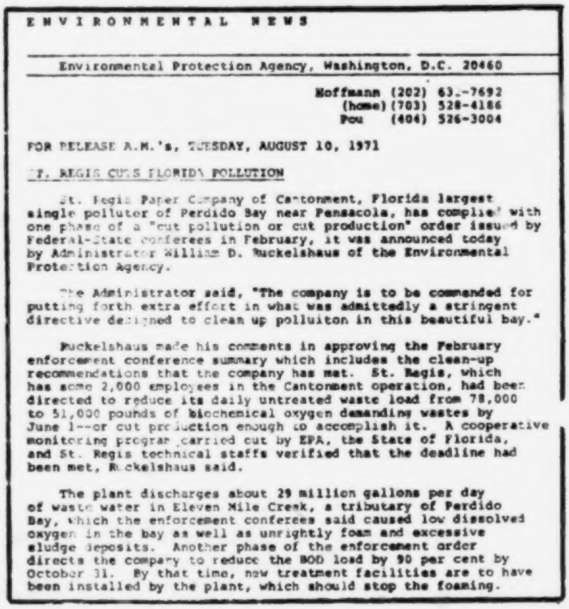
--Settleable solids in parts per million and pounds per day

--Carbonaceous matter in parts per million and pounds per day

--Volume in million gallons per day; and

--Temperature of the effluent at the final discharge point only.

* *



ENVIRONMENTAL NEWS

Environmental Protection Agency, Washington, D.C. 20460

Hoffmann (202) 63[illegible]-7692
(home) (703) 528-4186
Pou (404) 526-3004

FOR RELEASE A.M.'s, TUESDAY, AUGUST 10, 1971

ST. REGIS CUTS FLORIDA POLLUTION

St. Regis Paper Company of Cantonment, Florida largest single polluter of Perdido Bay near Pensacola, has complied with one phase of a "cut pollution or cut production" order issued by Federal-State conferees in February, it was announced today by Administrator William D. Ruckelshaus of the Environmental Protection Agency.

The Administrator said, "The company is to be commended for putting forth extra effort in what was admittedly a stringent directive designed to clean up polluiton in this beautiful bay."

Ruckelshaus made his comments in approving the February enforcement conference summary which includes the clean-up recommendations that the company has met. St. Regis, which has some 2,000 employees in the Cantonment operation, had been directed to reduce its daily untreated waste load from 78,000 to 51,000 pounds of biochemical oxygen demanding wastes by June 1--or cut production enough to accomplish it. A cooperative monitoring program carried out by EPA, the State of Florida, and St. Regis technical staffs verified that the deadline had been met, Ruckelshaus said.

The plant discharges about 29 million gallons per day of waste water in Eleven Mile Creek, a tributary of Perdido Bay, which the enforcement conferees said caused low dissolved oxygen in the bay as well as unrightly foam and excessive sludge deposits. Another phase of the enforcement order directs the company to reduce the BOD load by 90 per cent by October 31. By that time, new treatment facilities are to have been installed by the plant, which should stop the foaming.

Our N.W. Regional office jointly with the Environmental Protection Agency, St.Regis Paper Company and independent laboratories have confirmed St.Regis compliance with the 51,000 #/day maximum raw BOD_5 generation within the plant. Also with the 5,100 #/day maximum allowable discharge of BOD_5 to Eleven Mile Creek and the virtual removal of all settleable solids.

On January 13, 1972 St.Regis Paper Company reported the completion of a thirteen-point, major in-plant modification program primarily intended to reduce or eliminate foam-causing constituents from their discharges. Our regional office will continue to survey the shores of Perdido Bay to appraise the results of this just recently completed program.

Reports from St. Regis Paper on their feasibility study to reduce carbonaceous matter and color from their liquid waste, and on the application of their current water renovation research-grant project to the Pensacola mill are due next Feb. 15. However, we hope to hear from them shortly on the status of these projects.

Castro

JOSE F. de CASTRO, CH.E., P.E.
CHIEF, BUREAU OF ENFORCEMENT

West Florida Utilities - Avondale Subdivision was cited by the State on December 1967 for disposing of primary effluent without adequate treatment.

The Department of Pollution Control took this case under enforcement during the first quarter of 1969 and the corresponding abatement project was completed and placed in operation late in 1970.

State personnel has determined organic removal - BOD_5 - to exceed the 90% level, however, removal of suspended solids has not reached the 90% mark.

The installation of a prescribed additional clarifier and sludge pump - on order by the plant owner - should bring the Avondale subdivision well within the 90% minimum rule.

Florida Utility Company - Wedgewood Subdivision was cited by the State on January 1968 for disposing of primary effluent without providing adequate treatment. The Department of Pollution Control took the case under enforcement in mid 1969.

On November 1970, a dike break resulted in the release of sewage to waters of the State at Bayou Marcus Creek. A notice of violation was issued to seek damages for the incident.

Due to the recalcitrant nature of the Wedgewood Subdivision case the entire matter was refered on January 1971 to the Attorney General's office for appropriate legal action.

MR. WHITE: Would you clarify that last statement, Mr. deCastro?

MR. DE CASTRO: I have no reports of any foaming coming to my office. I am not denying--

MR. WHITE: I just didn't understand what you are saying.

MR. DE CASTRO: --that possibility. I just didn't have any reports and that is very unfortunate that we shouldn't have known.

MR. WHITE: Fine.

I think Mr. Levin has a question.

MR. LEVIN: Pepe, tell me, I am getting these figures a little bit confused.

MR. DE CASTRO: Yes, sir.

MR. LEVIN: Apparently the previous conference recommended a reduction of 77,000 pounds of BOD to--

MR. DE CASTRO: From 78,000 to 51,000 maximum. That is the generated raw BOD before treatment.

MR. LEVIN: Now, is that the same thing that you are talking about when you say that you are talking about 3,400 pounds?

MR. DE CASTRO: That is after the treatment. We have inflow and outflow. The raw BOD set by the conferees was

51,000 maximum. They are down to about 40,000, 48,000, so I get from EPA and from our lab and from the St. Regis people.

MR. LEVIN: So St. Regis is down about 13,000 pounds of that particular figure that was recommended by the conferees?

MR. DE CASTRO: Yes, sir.

MR. LEVIN: And then the other figure that you gave us of 5,100 down to 3,400, what is that?

MR. DE CASTRO: That is after the treatment into Eleven Mile Creek. They are down to about 3,400, so I see here from the report we have now. So as far as the--

MR. LEVIN: So they have gone even farther than what this conference has recommended?

MR. DE CASTRO: Slightly further down, yes, sir.

MR. WHITE: If I could interject something, I think that that would be based on the report at the time. I don't think you could conclusively state that they are down to that point for all time, I mean based on--

MR. DE CASTRO: The times that our lab has sampled they have determined figures below the 5,100 pounds, that is definitely.

MR. LEVIN: At the times that the lab has conducted the sampling?

MR. DE CASTRO: Yes, sir.

MR. LEVIN: I am going to ask you the same question I asked Container. Would it be possible that St. Regis could have done anything to have cleaned it up, so to speak, for that one particular sample?

MR. DE CASTRO: St. Regis in order to get to those levels would cut down production.

MR. LEVIN: No, that isn't what I am asking.

MR. DE CASTRO: I haven't answered yet. St. Regis has, I would say, roughly let's say ten, let's call it ten days retention time. I see no way how can they change the condition. Even if they changed the conditions it will take about ten days to show it.

MR. LEVIN: In other words, in the vernacular, we have got an honest count, so to speak?

MR. DE CASTRO: Let's say that they have to be honest as far as the lab because they have no time unless they are told a month in advance, and that would be very--

MR. LEVIN: What in your judgment is it that caused the foaming originally? What is it that they--

MR. DE CASTRO: Mr. Levin, there was a high level expertise here in this case from I think it was the State of Washington, which has lots of paper mills, kraft operations, and those levels set by the conferees were the result of the recommendations of those experts and of surveys that EPA or some university conducted in the southeastern U.S.A. on kraft mills. And at the time it was felt by the conferees that that level would take care of the foaming.

MR. LEVIN: What I am trying to find out, again let me emphasize, you know I am not an engineer or a biologist or anything like that, is it the BOD's or whatever it is that cause the BOD which in turn causes the foaming? Is this what--

MR. DE CASTRO: The foam constituents I don't think have been as yet determined precisely. That is my opinion. I am no real profound expert on paper mills, but the foaming tendency of paper wastes is notorious.

MR. LEVIN: Well, let me ask you this. The Container Corporation in Brewton and the St. Regis in Cantonment, are they roughly the same type of paper mill?

MR. DE CASTRO: I think they are both kraft--yes, they are both kraft operations.

MR. LEVIN: What reason is it that Container doesn't have foaming and St. Regis does? Can you tell me that?

MR. DE CASTRO: At the time I recall the foaming was in a way attributed to the possibility of overflows or leaks from the tall oil system. The tall oil system is a soap-making system, the tall oil stream is a soap-making stream, so definitely where there is tall oil there is a tendency to foam.

But I honestly don't have the answer. I know that aeration of kraft wastes tends to produce foam.

MR. LEVIN: All right, let me ask you this to compare this for me and see if we are comparing the same thing.

I noticed that yesterday this conference permitted or recommended that Container be permitted to discharge 4,850 pounds per day of BOD.

MR. DE CASTRO: Yes, sir.

MR. LEVIN: Now, are we comparing--is that the comparison that you are making with the 3,400 that St. Regis is--

MR. DE CASTRO: Yes, sir, those factors--those values were set by the conferees based on certain factors that were determined in this survey that the EPA or some university conducted in southeastern U.S.A., and that was based on so many pounds of BOD_5 per ton of either bleached or unbleached, so the factors applied to Container at Cantonment are the same as the ones applied to St. Regis and all paper mills.

MR. LEVIN: I understand. What I am trying to say now is that the 3,400 pounds that St. Regis is putting out per day--

MR. DE CASTRO: Yes, sir.

MR. LEVIN: --is that the same identical thing now we are talking about in permitting Container Corporation to put out

4,850 pounds per day?

MR. DE CASTRO: It is on the ratio of pounds of product per ton of pulp, yes, sir.

MR. MAURIELLO: Mr. Levin, let me clarify.

MR. LEVIN: All right, would you please?

MR. MAURIELLO: I think where you are getting confused is that Container Corporation--

MR. LEVIN: Excuse me. I was confused when I sat in this chair. (Laughter.)

Go ahead.

MR. MAURIELLO: The Container Corporation figure is based on a unit value that came from a research report that is used in the southeast, X number of pounds of--ton of production, rather, generate X number of pounds of BOD. That figure that you are looking at was based upon this. This same type of unit value was applied to St. Regis Paper Company when a limitation of 5,100 pounds was applied upon them, imposed upon them, because their production is higher than the Container. So the numbers are a little higher because the production rates are higher.

Now, I think what Pepe is saying is that they have met the 5,100 pound limitation and have gone down to 3,400 pounds and the 3,400 is in line with the same unit values that we would provide for the production rate that is now coming out of St. Regis Paper Company. So the unit values are the same.

MR. LEVIN: In other words, if you compare the amount that St. Regis puts out as compared to Container Corporation, then we are talking about 4,850 as compared to 3,400. It is just that St. Regis--

MR. TRAINA: We had evidence yesterday from the company, Container, that they are actually reducing it down to 2,250, I believe was the figure, wasn't it, Billy? So although the requirement is 4,800, Container is coming out now with 2,200-plus pounds.

MR. MAURIELLO: The ratios are the same.

MR. TRAINA: Which is comparable to the 3,400. In other words, this is actually what they are coming out with now. Although we set the requirement at 4,800, Container is putting 2,200-plus. Although we set the requirement for St. Regis at fifty-one, Pepe has reported that St. Regis is actually putting in thirty-four.

MR. WHITE: I would like to call on Mr. Billy Adams to come to the podium with Mr. deCastro. Why don't you just stand there, please, and see if you can clarify some of these questions.

BILLY H. ADAMS, CHIEF
ENGINEERING SERVICES BRANCH
SURVEILLANCE AND ANALYSIS DIVISION
ENVIRONMENTAL PROTECTION AGENCY
ATHENS, GEORGIA

MR. ADAMS: I am Billy Adams, Chief of the Engineering Services Division, at Athens, Georgia.

The limits for St. Regis were based on average production figures for southern mills. St. Regis at the time we did our survey was producing around 950 tons per day. Approximately 280 tons of this was bleached product. And on the basis of the average for bleached and unbleached mills in the south we arrived at 51,000 prior to treatment, 51,000 pounds of BOD prior to treatment. A 90 percent reduction of this is where the 5,100 pounds came from.

At Container the survey indicated that they were already below the southern mill average. Their bleach plant production is more than that at St. Regis. It is about half and half. The production is essentially the same, overall, 950 tons.

But if my memory serves me right, they were generating something like 4,600 pounds prior to treatment. We applied a 90 percent reduction to that figure and they are now down to 2,220 pounds per day.

MR. LEVIN: Can you tell me why they don't have foaming at Container and they do at St. Regis?

MR. ADAMS: I cannot.

MR. TRAINA: I might comment, it probably has something to do with the receiving waters. One discharges into a free-flowing stream and one discharges into an estuary that is not as--does not have the current and the movement in it.

MR. MAURIELLO: And brackish.

MR. TRAINA: It probably has something to do with that. Another fact is that St. Regis discharges into a brackish situation.

MR. MAURIELLO: Salt water.

MR. WHITE: I would like to add one comment that might add to the confusion now.

St. Regis is an old mill compared to the Container Corporation mill and you get a pretty wide divergence from mill to mill as to the raw waste loading that is generated. We had a lot of controversy here last time when we got into this raw waste loading aspect and set this limit of 51,000 pounds for the St. Regis company. But the conferees felt that this was a reasonable approach to do this and to take the overall average.

Does that help any?

Mr. Traina.

MR. TRAINA: While Billy is up there maybe Pepe can also respond to this.

But during the June survey, what were the loads generated by the plant during that time and how do they compare to--

MR. DE CASTRO: Joint sampling about 40,000. There were some differences between our local lab and the Canadian lab and your lab, but they were below the 51,000; they were about 40,000, roughly.

MR. ADAMS: Let me give you our results, please.

MR. TRAINA: Yes, sir.

MR. ADAMS: On June 23, 1971, the influent BOD before treatment was 25,000 pounds. After treatment it was 21,600 pounds

On June 24, the load generated prior to treatment was 33,400 pounds. After treatment 28,200 pounds.

On the 27th of June the load was 24,000 pounds prior to treatment and 22,000 pounds after treatment.

MR. TRAINA: Do you know what the production level was during this time? Was it approximately 950 tons a day?

MR. ADAMS: I don't have that exact figure, Paul, but I would assume that it was.

MR. WHITE: Mr. deCastro, I think, has something.

General Discussion

MR. DE CASTRO: I want to add one statement. Billy, you are correct, but you are a little misleading. You said after treatment. That was before the treatment plant was put into operation. This is the old system.

MR. ADAMS: It was the old system, that is correct, and that should be clarified.

MR. LEVIN: Let me find out one more thing, if I may please, Mr. White.

MR. WHITE: Mr. Levin.

MR. LEVIN: And I hope you don't misinterpret or imply anything by the question that I am asking.

What damage, ecological damage, to your knowledge does the foam cause?

MR. DE CASTRO: Are you--

MR. ADAMS: Who are you directing this to? (Laughter.)

MR. LEVIN: I don't care.

MR. WHITE: Mr. Levin, I think we are going to have some other people here, I believe, who will possibly testify to this.

Number One, if I might interject something, it is an aesthetic problem. I understand from previous testimony that the foam is irritating to the touch of the skin and possibly there are some other irritants associated with this.

MR. LEVIN: You see, the thing that makes it so hard for me to understand is the fact that the foam is there. It would seem like to me that if Container Corporation is dumping the same stuff into Escambia River, even though the foam is not there, those irritants still ought to be there. Now, is that not right or am I wrong?

MR. WHITE: Well, again, you have simply got a different system and I think it reacts differently and there is likely some divergence in a strict analysis of the effluents. Now, I am not sure, for instance, that the Container Corporation and St. Regis have the same ratio, for instance, of bleach mill wastes.

MR. ADAMS: They do not.

MR. WHITE: Can you answer this, Mr. Adams?

MR. ADAMS: At the time we did the survey, the bleachery production at St. Regis was around 280 tons per day. At Container it was around 450.

MR. WHITE: Mr. Levin.

MR. LEVIN: Billy, in your judgment, if you had the figures that Pepe just gave you, do you have any comments that you would like to make on that? Since your tests were made back in June of 1971, Pepe's tests were run just ten days ago, and knowing Pepe to be the honorable man that I know he is and that he has done the tests properly, assuming all that is done, what comments would you make about that insofar as to the future of this particular type plant?

MR. ADAMS: The production levels look good if they are down to 3,400 pounds per day.

MR. LEVIN: Well, do you--

MR. ADAMS: I did not expect that from the treatment system that was being installed. That is a personal observation.

MR. LEVIN: Do you look for an improvement in the foaming and things of this nature if this continues on in the same fashion that St. Regis is doing?

MR. ADAMS: I think it will take time to tell.

MR. LEVIN: What I am trying to say is, do you think that there is something that is already there that is contributing to the foaming that will eventually disappear in time provided St. Regis continues to do, apparently, as well as they have done based on what we have heard here this morning?

MR. ADAMS: In their tests for foam, we ran resin and fatty acids, and if these levels are reduced in the effluent from the mill I am sure that there will be a reduction in foaming in Perdido Bay in time. This may be a year from now, may be--

MR. TRAINA: Mr. Levin, let me make a comment to that.

I think the only guarantee that there will be no foaming in the bay is the installation of a closed system, which has been suggested and discussed during previous sessions of this conference, and I would hope today the company would report to the conferees on progress. But they are undertaking a large scale research program aimed at reuse of their waste effluent, which I might add with a considerable Federal grant to do that.

But short of that, I don't know whether anyone could stand up here, I know I couldn't, and guarantee that there will be no foaming in the bay with any discharge, even with these reductions that we have seen.

MR. LEVIN: Tell me what you mean by in-house. Do you mean a complete lack of discharge into the water?

MR. TRAINA: This is the project that the company is considering and they have had that under research for several years now.

MR. WHITE: I want to interject something here.

I think a lot of these questions might be more appropriately directed at some of the other participants when the company reports. I don't know how many people they have listed here to give a report. But we can get back into this if you are not satisfied with any responses received then.

MR. LEVIN: John, don't misunderstand me, the only thing I am driving at, and I want everybody here to know this, I can understand how these people from Alabama feel, I can understand how the people from St. Regis feel, and if it takes in-house, obviously there must be technology to stop discharge.

The only thing I would feel objectionable within myself would be, and I think everybody here should know how I feel about this thing, that if we have got that kind of technology for St. Regis, then there is no reason why all other paper mills, including the one at Container Corporation, shouldn't be treated the same way.

MR. WHITE: Well, your point is well taken, but again we have a difference between the two mills, the discharges and the receiving waters, and I am not suggesting that we drop this issue at all, because this is probably the most critical issue involved in this situation.

But I just think that we might be in a better position to have an exchange between us after we hear from the company and possibly some of the other participants.

MR. DE CASTRO: Mr. Chairman, I would like to ask a question. May I ask a question of Mr. Adams?

MR. WHITE: Let's go off the record.

(Off the record.)

General Discussion

MR. WHITE: Let's go back on the record.

Do you have any comment to make after this discussion with Mr. Adams?

MR. DE CASTRO: No, that is my only question.

MR. WHITE: For the record, Mr. deCastro expressed concern that the State of Florida was not notified of a foaming problem if it has occurred recently.

The only thing that I can say, Mr. deCastro, that I will urge all parties associated to get any information to you as soon as it--well, as soon as any foaming develops.

MR. DE CASTRO: Thank you very much, Mr. Chairman.

MR. WHITE: Mr. Mauriello.

MR. MAURIELLO: Mr. Chairman, we have another brief presentation. It deals with the Bayou Marcus Creek recommendation, and if the Chair wishes to maybe we can dispose of it and then get to the St. Regis.

MR. WHITE: I would like to proceed with that so we can devote time that I think we need to to this other prime problem.

MR. MAURIELLO: I would like to ask Mr. Doherty, our Regional Engineer, to make a brief statement concerning the Marcus Creek area.

P. J. DOHERTY

REGIONAL ENGINEER

FLORIDA DEPARTMENT OF POLLUTION CONTROL

GULF BREEZE, FLORIDA

MR. DOHERTY: Mr. Chairman, conferees, ladies and gentlemen.

My name is P. J. Doherty. I am the Regional Engineer for the Northwest Florida Department of Pollution Control.

My comments here are unprepared. In other words, I do not have a prepared statement.

Concerning Bayou Marcus, which is one of the items on the previous conference, I would like to make the following remarks:

At the time of the last conference there were five municipal plants contributing domestic wastes to Bayou Marcus, which is a stream that discharges to Perdido Bay. Since the last conference one of these treatment plants, namely the Devonshire Plant, has been combined with another plant or it has been taken out of service and eliminated this plant, leaving at the present time--I will correct my figures--there were six original, presently there are five plants. All five plants are presently under our permit system, the State of Florida's permit system. All plants have temporary operating permits in view of the fact that they do not meet the requirements for minimum treatment.

The newest plant on Bayou Marcus, the Avondale Plant, which is located at the lowest end of the Bayou Marcus Creek, was recently improved to secondary facilities and is operating at 90 percent level with the exception of solids. Now, the solids in the investigation indicate there is a problem primarily in the tertiary pond caused by algae and the algae have reduced the solids removal efficiency below the State standards. The plant itself is removing the solids. However, the buildup of solids is in the tertiary pond and this is being corrected at the present time. We expect within a month or so the plant will be within the State's requirements.

All other plants do not meet the requirements and they have been requested to file construction applications to the State to indicate the corrective action that will be taken and establish dates.

In conjunction with the Marcus Creek also, both the city of Pensacola and Escambia County have adopted the five-year metropolitan plan, sewer plan. This plan outlines a system of corrective action for the sewerage system within the county area, the county and city area. At the present time the plan has been in the courts from the standpoint of having a determination as to the legality of the legislative act which was passed a year ago authorizing the consolidation of the facilities, the sewerage and water facilities, within the county and city area. At the present time it is in the courts testing the legality of the legislation. And at this point, of course, the consolidation has not occurred.

Under the five-year plan there is an implementation schedule which does provide for the purchase of the privately-owned plants and city-owned plants within the Bayou Marcus system and a plan also to construct intercepting sewers and trunk sewers and provide a new plant at the lower end of the Marcus Creek to regionalize the area now developed around Marcus Creek into a single sewerage system, a countywide system. In view of the fact that the consolidation has not occurred, of course,this has not come about at the present time.

I think that is essentially my presentation.

MR. WHITE: Thank you.

Do you have questions or comments, Mr. Traina?

MR. TRAINA: Mr. Doherty, the five facilities you mentioned, these will be included in the five-year master plan?

MR. DOHERTY: Yes, this is correct. The five facilities that I mentioned--

MR. TRAINA: That are not now meeting standards that are operating on separate permit will be included in the five-year master plan?

MR. DOHERTY: All five facilities are included in the five-year master plan. It calls for the elimination of the five plants, consolidation into a large plant at the lower end of Bayou Marcus, and elimination of these existing plants. That is what the five-year--

MR. TRAINA: What is the schedule for the actual conversion of these temporary facilities to the regional plant?

MR. DOHERTY: The schedule--

MR. TRAINA: Will that meet the schedule established by this conference?

MR. DOHERTY: The present schedule, again provided by the five-year plan, calls for at the present time the purchase of the privately-owned facilities. Of course, this is not being met because of the court case concerning the consolidation. In other words, the city or the county either do not have the legal authority to carry out this plan without a consolidation of the facilities.

So at the present time the plan is not being carried out until this court testing is completed and consolidation can occur.

MR. MAURIELLO: Paul, let me answer your question.

MR. TRAINA: All right.

MR. MAURIELLO: No matter which way you cut it, there will not be a meeting of a January 1, 1973, deadline for regionalization of that area. They just can't--

MR. TRAINA: Is it because of the legal problems or problems of commitment on the part of--

MR. MAURIELLO: No, even without the legal requirements, the timing and the scheduling of the five-year master plan pushed this up into 1973 and 1974 for the consolidation of these systems.

MR. TRAINA: I just make this comment here, I guess we will have to discuss this, we put some rather stringent requirements both in this conference and the one we have had these last two days with regards to dates on industrial sources. I think it would be fair to do that and to expect that from our municipal sources. I realize that there has been a continuing problem of getting the city and county together. Last year when we met we were concerned about those groups not getting together.

Apparently they have gotten together now and,as I gather,it is in the courts. I don't know what we can do about that.

But--

MR.MAURIELLO: I might--

MR. TRAINA:--this just remains a problem that we just haven't gotten to an adequate conclusion.

MR. MAURIELLO: I might suggest that we have representatives from the city here and also the Planning Council and maybe they can answer some of these questions a little bit later.

MR. TRAINA: Fine.

MR. WHITE: I don't believe we had indicated here the Planning--yes, I do see, your Planning Council members.

Any other comments or questions?

You raised several questions in my mind, Mr. Doherty, but I think I will wait for these other members who will make a presentation.

MR. MAURIELLO: I would like to ask Mr. Dan Krumel, from the Escambia-Santa Rosa Planning Council, if he would come forward.

DANIEL F. KRUMEL
EXECUTIVE DIRECTOR
ESCAMBIA-SANTA ROSA REGIONAL
PLANNING COUNCIL

MR. KRUMEL: Mr. Chairman, my name is Daniel F. Krumel. I am the Executive Director of the Escambia-Santa Rosa Regional Planning Council.

Mr. Doherty has answered most of the questions I think you had and he also stated many of the things I was going to say.

The only thing that I could add to his statement is that the five-year sewer plan which our organization prepared called for construction of this interim plant that Mr. Doherty talked about to commence on January 1 or thereabouts of 1973 and it was to be completed by mid-1974, so that is about 18 months.

However, to my knowledge, no progress has been made regarding consolidations of these systems on Bayou Marcus and at the present time it appears to me, and I am sure it will appear to you also, that construction in early 1973 appears to be out of the question. I can see no way that we will have a consolidated system on Bayou Marcus early enough to acquire these systems, to prepare the plans, to prepare the financing, all of the things that go with it, that we would have this plant in operation by mid-1974.

Now, I would be glad to answer any questions.

MR. WHITE: I would like to explore something. Maybe Mr. Mauriello or Mr. Doherty might have to come up to answer this.

Is it the county's responsibility for seeing that these existing plants are in compliance or is this a State responsibility as you see it, Mr. Mauriello?

MR. MAURIELLO: Right now the existing plants are under the State responsibility. I don't think the county has the responsibility so far as enforcing on their own people.

I am not sure I understand your question.

MR. WHITE: Well, two of the plants are operated by individuals, is this correct?

MR. MAURIELLO: Two of the plants are owned by the city of Pensacola.

MR. WHITE: The plants not owned by the city of Pensacola?

MR. MAURIELLO: Are privately-owned facilities.

MR. WHITE: Have any steps been taken to see that these private facilities if they are not in compliance with your rules and regulations--

MR. MAURIELLO: Yes, sir.

MR. WHITE: --will be in compliance?

MR. MAURIELLO: Right. No matter if there wasn't a consolidation, I think if I can answer your question this way, no matter if the consolidation is here or not, the plants are going to be in line under the permit conditions that we have issued to bring them up to the minimum of 90 percent treatment.

MR. WHITE: What is the deadline for achieving this?

MR. MAURIELLO: Mr. Doherty might have to answer the specifics, but each of these are under the temporary permits, in fact two of them are under enforcement action and maybe Mr. deCastro could answer, really, those questions that are in this writeup.

MR. WHITE: Which one do you think should? I would like to find out.

MR. MAURIELLO: Well, we have West Florida Utility Company, which is the Avondale Subdivision, which is under an enforcement action, and also Florida Utilities, which is the Wedgewood Subdivision. Both of these are under orders from the Board and maybe Mr. deCastro can answer for those two.

MR. WHITE: Would you come back to the microphone, Mr. deCastro?

MR. DE CASTRO: We have two cases under enforcement in the Bayou Marcus area. The Avondale Subdivision, which is the West Florida Utilities, and they have implemented an abatement program, a project which was sampled, and they showed over 90 percent removal of BOD_5. However, the removal of solids was not up to that level. There was some indication of algae being the reason for those solids showed in the analysis.

We have prescribed an additional clarifier and a sludge pump, which are now on order by the plant owner, and we show that that should bring them way above the 90 percent minimum. So I would say that they have completed something which doesn't show sufficient as far as solids but it did show about 93 percent removal of BOD_5 consistently, that is as far as the Avondale Subdivision, that is the first stage of the thing. Eventually they may go to the regional planning.

MR. WHITE: Well, now, you are saying they are in compliance with your rules and regulations?

MR. DECASTRO:Yes, sir. They completed--and as a matter of fact they completed back as late as, let's see, late 1970. It is the delivery of the new clarifier and installation of the new clarifier to take care of the solids, so that they were up to about 80, 85 percent. The BOD was 92 percent, so the clarifiers and the new additional system which is on order and I understand is about to be delivered should bring them way above 90 percent, both in solids and--

MR. WHITE: This relates to Avondale Subdivision?

MR. DE CASTRO: Avondale Subdivision.

MR. WHITE: You said there were two?

MR. DE CASTRO: The case of the Wedgewood Subdivision is a different story.

MR. WHITE: Of which?

MR. DE CASTRO: Wedgewood. It is in my writeup, sir.

> Wedgewood was cited by the State on January 1968 for disposing of primary effluent without adequate treatment. The Department of Pollution Control took the case over from the Bureau of Sanitary Engineering in mid-1969.
>
> On November 1970 a dike break resulted in the release of sewage to waters of the State at Bayou Marcus Creek. A notice of violation was issued to seek damages for this incident.
>
> Due to the recalcitrant nature--and I did report this in the previous conference--of the case the Wedgewood Subdivision case was referred entirely to the attention of the Attorney General's office for appropriate legal action.

It is still there, the two cases of damages and the action of noncompliance with State rules and State orders. It is in the hands of the legal people for appropriate action, although I am told that they have done something lately which I have no--

MR. WHITE: Could we arrange to receive a report, the conferees, concerning the status of that action?

MR. DECASTRO:We did request a report from Mr.Chaney's office and it is due within the next week or so, yes, sir.

MR. WHITE: Mr. Traina has some questions, but I want to clarify something else in my mind now.

Is this it with respect to the plants that are not in compliance with your rules and regulations?

MR. MAURIELLO: The other three plants are not under enforcement action, they are only under the permit system with a temporary permit. They are providing about 75 to 80 percent treatment and the conditions of the permits are to bring them up to the 90 percent. Now, these are all conditions which will be applied prior to January 1, 1973, to meet the minimum requirement.

So far as regionalization and what Mr. Krumel was talking about is the complete elimination of these plants. So there are two things that are going on, bringing the plants up to the limitations and the requirements now but yet using the planning document that has been prepared for the complete regionalization of the whole area.

MR. WHITE: Mr. Traina.

MR. TRAINA: You say that Wedgewood--I hope I am using the right word--is recalcitrant?

MR. DE CASTRO: Yes, sir.

MR. TRAINA: Does this mean that they have no plans to meet your orders?

MR. DE CASTRO: They have no nothing. They have been just evading our action and we sent the case over to our attorneys for action and then they--

MR. TRAINA: What recourse does the State have if they just refuse to abide by your orders?

MR. DE CASTRO: As far as I can tell, $5,000 a day.

MR. TRAINA: $5,000 a day?

MR. DE CASTRO: Yes.

MR. LEVIN: Which will get somebody's attention, I will tell you.

MR. TRAINA: I would hope it would.

MR. DE CASTRO: That is in the hands of Mr. Chaney, our attorney, and I am sure he will take action. I should have a report within the next week or so.

MR. TRAINA: Fine.

Mr. Mauriello, what are the other three plants by name?

MR. MAURIELLO: I would like to get Mr. Doherty up here. Montclair is one,which is owned by the city of Pensacola.

MR. DOHERTY: Running down through the plants again, there is Wedgewood, which has been mentioned, this is the one that has legal action against it. The next plant is called the Mayfair plant.

MR. TRAINA: Would you say that again, please, sir?

MR. DOHERTY: Mayfair, M-a-y-f-a-i-r. This is owned by Florida Utilities. It is a privately-owned plant, subdivision plant. The other plant is the city of Pensacola's Montclair plant, M-o-n-t-c-l-a-i-r. Then there is Fairway Mobile Homes and Avondale. Those are the five plants.

I might mention about the Fairway Mobile Homes, we have had two conferences with them. We have extended their permit for 30 days and they are in the process of submitting to us a proposal, that is a construction application, to eliminate that plant and to combine or regionalize it with the Avondale plant and that would eliminate that plant and this is pending. I expect this will be carried out. We have not received the construction application permit yet.

MR. WHITE: Fairway Mobile Homes is owned by a private group or utility?

MR. DOHERTY: Right, this is a private plant, and it is also planning and indicated that they will submit an application to us to combine with the Avondale, eliminating that plant.

MR. WHITE: Avondale is a city of Pensacola--

MR. DOHERTY: No, Avondale is a privately-owned plant also.

MR. TRAINA: What about the Montclair plant?

Oh, before we get off Fairway, when do you expect that connection to be made to Avondale?

MR. DOHERTY: To Avondale? The report is due this month, that is the application is, and the time schedule will be included in that application. I have not received it.

MR. TRAINA: You feel that--

MR. DOHERTY: It will be done before 1973, yes.

MR. TRAINA: Oh, fine.

MR. DOHERTY: It will be done before 1973.

MR. TRAINA: The Montclair plant, what--

MR. DOHERTY: The Montclair--

MR. WHITE: Before we get away from that, if that connection is achieved then all of this is going to receive adequate treatment?

MR. DOHERTY: Yes.

MR. MAURIELLO: The city of Pensacola representative is here and I think he can probably better answer the Montclair situation.

MR. WHITE: All right, we will ask him.

MR. TRAINA: How about the Mayfair?

MR. DOHERTY: The Mayfair plant does not achieve either the 90 percent removal efficiency in solids or BOD. At the present time this is one of our plants that has not complied with our permit requirements and we are forwarding--the name is in process of being forwarded as being delinquent and reporting and taking action under the permit system. It has been placed with it. The permit has expired without any action by the plant and the appropriate official is being notified concerning this.

MR. TRAINA: Mr. Doherty, would you consider them recalcitrant as well?

MR. DOHERTY: Beg pardon?

MR. TRAINA: Mr. Doherty, would you consider them recalcitrant as well?

MR. DOHERTY: I think that word would apply.

MR. TRAINA: Maybe Mr. White would like to make some comments, but there are some Federal provisions with regard to violations that could be superseded on the State ones.

MR. WHITE: I think we are going to have to direct our staffs to investigate this in conjunction with the State to see where respective responsibilities lie. I mean we do have a responsibility under the enforcement conference recommendation and conceivably some further action could develop at both levels.

But I do think we ought to coordinate and find out additionally what legal action is contemplated against Mayfair as in the case of the Wedgewood.

MR. MAURIELLO: Let me comment on this. Basically what it amounts to is a violation of the administrative rules which will be subject to $5,000 penalty under State law.

MR. WHITE: As Mr. Levin pointed out, that should get their attention on this.

MR. LEVIN: Guaranteed.

MR. WHITE: Mr. Krumel, I want to explore one thing with you.

Now, if you are unsuccessful in this litigation, then of course those outlying privately-owned utilities will not be under any governing body that would be responsible for this five-year plan that you referred to, is this correct?

MR. KRUMEL: That is right. They would still be under the State. It appears to me at this time, however, that there seems to be some division of effort here in that the State is requiring improvements and upgrading of t existing plants and on the other hand we are talking about a consolidation of all these plants out there under one system and building an interim, a new plant.

MR. WHITE: We were just getting facts on this thing now because apparently something needs to be done. Do you have any prognosis as to when this litigation will be resolved?

MR. KRUMEL: No, I do not. I don't think anyone would venture a guess.

MR. WHITE: In other words, without that, I mean assuming that some of these are not in compliance, I mean this could go on for a long time--

MR. KRUMEL: Indefinitely.

MR. WHITE: --this litigation and would continue these other dischargers in violation, so I do think--

MR. KRUMEL: That is right.

MR. WHITE: --that serious consideration has to be given to appropriate action at other levels.

Go ahead, Mr. Traina.

MR. TRAINA: Mr. Krumel, I would say, though, you had indicated that even if this litigation were resolved now you could not meet the January 1973 deadline.

MR. KRUMEL: There is no way that I--they are talking about construction of a new plant.

MR. TRAINA: So that the efforts here to upgrade these plants before 1973 are efforts that need to be undertaken even though we are going to phase them out. It just seems to me that we have got to put everybody on order here and meet these deadlines as we establish them.

MR. KRUMEL: I agree that we need to meet the deadlines, but I think we need to keep in mind also the amount of money that we are talking about. I mean this is a part of it, I am sure. I don't know how many dollars we are speaking of investing in plants that might be abandoned say within the next couple of years. I have no idea whether we are talking about $1 million or $10 million and I don't know how to measure that up against the ecological damage that might be done if we don't go ahead and do that. I am afraid we don't have all the answers to that.

MR. WHITE: You raised interesting points. I think we have got to get the respective technical staffs together to consider this problem. Thank you.

MR. KRUMEL: All right, thank you.

MR. WHITE: Any other comments or questions?

MR. MAURIELLO: I would like to call on Mr. Bill Spriggs, City Engineer for the city of Pensacola.

WILLIAM SPRIGGS
DIRECTOR OF PUBLIC UTILITIES
CITY OF PENSACOLA, FLORIDA

MR. SPRIGGS: I have asked Mr. Mandy, gentlemen, to come up and pass out a report or prepared statement.

My name is William Spriggs. I am the Director of Public Utilities for the city of Pensacola.

I am going to address these comments to the Bayou Marcus area and I have divided them, as you can see from the statement, into two parts. The first part concerns itself with respect to the city's responsibilities as influenced by its Montclair and Lincoln Park sewage treatment plants and the relation of the planning for those plants to planning for the expansion of the Main Street Sewage Treatment Plant. I believe that these comments in general will add to and complement what Mr. Doherty, Mr. Mauriello and Mr. deCastro and also Mr. Krumel have already said.

The second part concerns itself with general comments relative to the acquisition of private systems that constitute the majority of the effluent discharges to the Bayou Marcus Creek watershed areas.

I should mention that Lincoln Park has not been mentioned. This is a plant that is of 80,000 gallons capacity and lies north of Interstate 10. It also discharges to the Bayou Marcus Creek watershed or drainage area. We do provide tertiary treatment and are meeting required State standards at that plant.

During the past year we have not accepted new connections at the Montclair Sewage Treatment Plant because of the fact that it was at its capacity. It is a 525,000 GPD plant. The long-range plans for the Montclair Plant and the Lincoln Park treatment plant envision pumping the sewage from both of these locations, in other words they would be converted to major pumping stations, and the sewage would be pumped from there to the Main Street plant. The reason we were able and have been able, of course, to curtail additional connections at Montclair during the past year is because our collection network has been extended so that we could accommodate requirements in that area.

In the case of Lincoln Park, and this again conforms with the five-year master plan, we do envision an addition at that plant in order to maintain the standards that we are now meeting so that time will be given so that we can get to the expansion of the Main Street Plant.

As of last night, the appropriate committee for the city council did approve expansion of the Main Street Plant to this extent and that authorization for design would be allowed to go forward and then, of course, in keeping with this that applications would be made to the appropriate Federal and State agencies. This means, of course, that because of the situation that we are in with respect to the city and the county under the water and sewer transfer act, which does require a court case to determine the validity of the act, that the city is moving forward.

Now, city action, of course, must be approved by the county, as was developed at last night's meeting, and of course we do believe that this will be done. The matter of the expansion of the Main Street Plant will be referred to the full council at tomorrow night's council meeting.

Under part 1 we commence by indicating that the five-year sewer plan for metropolitan Pensacola envisioned a nine million GPD expansion at the present Main Street site, which is a nine million gallon per day plant. The four million gallon per day interim Bayou Marcus Creek plant that is proposed in the five-year plan and has been discussed this morning was aimed at and intended to be an interim plant that would accommodate these plants that have been discussed in the Bayou Marcus watershed. The present expansion has been increased to 16 million gallons as a proposed expansion rather than a 9 million gallon per day expansion in order to eliminate the time and money necessary on building an interim plant. This will in some instances either modify or change what some of the previous speakers have told you.

We have just received a limited number of copies of this expansion study. I do not have a copy with me. These came in last Friday and we do expect to have additional copies available sometime this week. I would be delighted if the conferees would like to see if we couldn't get an appropriate number of copies, if you wish, of the proposed expansion.

MR. TRAINA: Sir?

MR. SPRIGGS: Yes, sir.

MR. TRAINA: As I understand it, now, the city has decided not to construct the interim Bayou Marcus plant but rather expand the Main Street plant to accommodate all these private and semi-public facilities--

MR. SPRIGGS: Yes.

MR. TRAINA: --that we have mentioned here?

MR. SPRIGGS: The size of the plant would be enough, even though we have not yet--part 2, of course, as you probably already noticed, addresses itself to the acquisition of private systems, which has been discussed at some length, but that interim plant, you are right, would be eliminated and the proposed 16 million gallon expansion would be, of course, large enough to accommodate the 4 million proposed interim plant.

MR. TRAINA: What effect will this have on the scheduling of connections for these five or so private and semi-public facilities? Can we expect to get those connected quicker to an expansion of the Main Street Plant as opposed to building a new plant?

MR. SPRIGGS: It is our personal thought that this might be accomplished, yes, sir.

MR. TRAINA: I would hope so, let me put it that way.

MR. SPRIGGS: Now, I think about what has been said earlier by several of you gentlemen, including Mr. Mauriello and Mr. Krumel, it would not be possible, of course, to construct not only the interim plant or the Main Street expansion either certainly before mid-1973 or even into sometime in mid-1974.

MR. TRAINA: We understand that. But let me ask the question another way.

You don't think by changing from the interim Bayou Marcus plant to the expansion plant you are going to be adding a significant amount of time to completion of the whole system?

MR. SPRIGGS: No, sir.

MR. TRAINA: O. K.

MR. SPRIGGS: We have the benefit, Mr. Traina, of the fact that after the five-year plan was received, and I can stand corrected by Mr. Krumel, I believe it was received in May of 1971, it was very soon thereafter in the summer of 1971 the authority for going ahead, for allowing the consultants to go ahead, with this Main Street expansion study was made at that time. In other words, it was made sometime in the summer or late summer, I believe, of last year.

Yes, sir.

MR. WHITE: Does that conclude your presentation?

MR. SPRIGGS: No, sir, I have some other comments.

In Part II we mention, of course, that the master plan for 1971 states that implementation of plans that would lead to providing a metropolitan system, that is a publicly-owned unitary system in the Pensacola area, would eventually require the acquisition of existing privately-owned sewage plants. And without reading the rest of the prepared statement, I think I can capsule it with these comments:

The Water and Sewer Transfer Act which became effective as law, I believe, on July 6 last year, does of course complicate, I believe, as everyone recognizes, the fact that the further acquisition of private systems cannot be done until this act has either been approved by the courts and then assuming, of course, that we have established an effective date, there will be an attempt at issuing revenue bonds to purchase these systems too.

I just want to add these comments in conclusion and the fact that the city is proceeding basically in accord with the five-year plan. We do propose, of course, to construct interim facilities at Lincoln Park which will meet the five-year plan and, of course, the city does have under immediate consideration now the expansion of the Main Street plant which would offer further accommodation and long-range accommodation for all of these systems, including the private systems eventually.

MR. WHITE: Mr. Traina.

MR. TRAINA: I just might make the comment, too, that apparently this decision of not going to an interim Bayou Marcus plant and put it into Main Street plant would result in no municipal discharges, then, to Bayou Marcus?

MR. SPRIGGS: That is right.

MR. WHITE: Comments or questions?

MR. MAURIELLO: Do you have a comment?

I just want to make a comment.

MR. WHITE: Proceed.

MR. MAURIELLO: I would just like to say that I think it is one of the first times that we have seen some general direction to some planning activity, at least there is some documentation that we can go to and see a direction for control. We have been most encouraged. Of course we are a little disheartened about the court action, but we realize that this has to be. And of course our concern is to get some scheduled dates of implementation of the entire works, as Mr. Spriggs brings out, and get all of these facilities into some sort of regionalization.

MR. WHITE: Any other comments or questions?

MR. SPRIGGS: Thank you, gentlemen.

MR. WHITE: If not, thank you, Mr. Spriggs.

Mr. Mauriello, I believe we will recess for 10 minutes before proceeding.

(RECESS)

MR. WHITE: Let's go back in session, please.

Before proceeding with Florida's presentation, I think I should announce, and I hope this is not going to fall in the middle or maybe Mr. Levin could make some adjustments to his schedule, but he has an appointment which necessitates his leaving at noon. I would like to recess at noon for an hour and a half for lunch break, and I hope we are not in the middle of anybody's presentation. If we can avoid any interruptions at a critical time, we will attempt to do so.

Mr. Mauriello, would you proceed?

MR. MAURIELLO: I would like to make just one brief announcement. There was some discussion about the State of Florida as to who to contact in regards to foam.

I would like to suggest that anyone who has any indications or pictures or comments to make on the foam problem should address it to our offices in Tallahassee addressed to Mr. Vincent D. Patton, Executive Director, Department of Pollution Control, Tallahassee, Florida.

MR. LEVIN: Under no circumstances contact the head of Pollution Department in Pensacola. (Laughter.)

MR. MAURIELLO: Mr. Chairman, we have an indication from Mr. Hudson, Resident Manager from St. Regis Paper Company, that he would probably be the initial spokesman and I gather that Mr. Hudson would have other representatives.

Is Mr. Hudson here?

MR. HUDSON: Yes.

RUSSELL T. HUDSON
RESIDENT MANAGER
ST. REGIS PAPER COMPANY
CANTONMENT, FLORIDA

MR. HUDSON: Mr. Chairman, conferees, ladies and gentlemen.

My name is Russell Hudson. I am Resident General Manager of St. Regis Paper Company's kraft pulp and paper mills near Pensacola.

Since the last meeting of this enforcement conference one year ago, St. Regis has made very substantial progress toward abatement of water pollution. We are pleased to report that St. Regis has carried out all of the conferees' recommendations of last year. The improvements which they recommended have been completed and full-scale secondary treatment of discharges from the plant is now in operation. Also, longer range research and development activity jointly sponsored and engaged in by EPA and St. Regis at the Pensacola location are at targeted stages of completion.

Our presentation will be in two parts. I will speak to the first three recommendations of the 1971 conference, and our Mr. Roy L. Miller will discuss the company's progress relating to the other recommendations on color, carbonaceous organic material, and water reuse. Mr. Miller is in charge of the joint research study between St. Regis and the Environmental Protection Agency relating to water renovation.

I will read each of your recommendations and comment briefly as to the company's progress. The first recommendation reads as follows:

> The St. Regis Paper Company at Cantonment, Florida, shall reduce, by June 1, 1971, the five-day BOD generated within the plant to a level not to exceed 51,000 pounds per day. Particular attention shall be paid to tall oil and other recovery processes.
>
> If this reduction cannot be met by June 1, 1971, the company shall reduce plant production levels as necessary.

When the conference adopted this recommendation nearly a year ago, we seriously doubted that it could be met. However, we approached it in the spirit of trying to do our best. We brought together our management, engineering and technical people, and our operating personnel in an effort to reduce the in-plant BOD discharges.

As you know, our efforts were more fruitful than we ever expected, and we were able to comply with the recommendation by June 1, 1971, as required. I'm sure we would not have met this requirement without the cooperation and effort put forth by our employees. The company was gratified that Mr. Ruckelshaus, head of the Environmental Protection Agency, has recognized and expressed appreciation for our successful efforts.

R. T. Hudson

I'm going to reverse the order of recommendations two and three, and come back to recommendation two later. The third recommendation reads as follows:

> St. Regis Paper Company shall not discharge more than 5,100 pounds per day of five-day BOD to Eleven Mile Creek at the completion of construction of waste abatement facilities scheduled for, and in no event later than, October 31, 1971. If further investigation shows that this limit is excessive, St. Regis Paper Company will be required to further reduce its waste effluent discharge.
>
> There shall be a maximum feasible reduction of carbonaceous organic materials. St. Regis Paper Company shall monitor its effluent to measure these reductions, conduct a feasibility study, and submit a plan of abatement for carbonaceous wastes to the conferees by February 15, 1972.

On October 22, 1971, we placed into full service an improved secondary water treatment system which had been under construction since late 1970 and in progress since early 1968.

The system includes biological treatment for BOD

R. T. Hudson

reduction in which microorganisms utilize oxygen to digest decomposable dissolved organic materials and convert them to carbon dioxide and water. The system also includes an expansion of the solids removal facilities that have been in operation for many years.

The initial design approved by the State of Florida included some four and a half days of retention and 1,200 horsepower applied to aeration. The company expanded that design in 1970 to six days retention and 1,500 horsepower aeration, which was subsequently approved by the State.

The expanded system includes 15 aeration turbines, which provides an excess capacity or much more aeration than the process can utilize. This gives a wide margin of safety. The excess capacity provides the system with the flexibility of maintaining and alternating service of aeration turbines without upsetting the stability of the treatment system.

We are pleased to advise you that the system is doing its job very well. Our tests and those of the Florida agency indicate that BOD discharges after treatment are in compliance with your recommendation calling for 5,100 pounds per day.

Recommendation two:

> The St. Regis Paper Company shall, by June 1, 1971, materially remove the foam-causing

constituents from its waste discharge such that unaesthetic foaming in Perdido Bay is eliminated. The company shall report to the conferees monthly beginning 4-1-71 on the methods being utilized to accomplish this objective.

The foam-causing constituents in the company's effluent have been materially reduced to a fraction of what they were at the time of the conference last year.

We approached the foam problem in two ways: first, through the 13-point program of in-plant modifications and other efforts to reduce in-plant BOD discharges; and second, through more efficient treatment with the expanded treatment system. We worked vigorously to identify and reduce the flow of foaming constituents into the treatment system. And a substantial quantity of foaming constituents were eliminated with the reduction of in-plant BOD from some 78,000 lbs/day to less than 51,000 lbs/day.

Through improved treatment, which I described earlier, present BOD discharges after treatment are less than 5,100 pounds per day. When the conference was held last year, the figures of discharge at that time were some 40,000 pounds per day.

Scientific literature and our own experience confirm a correlation between BOD and foaming potential.

You may be interested to know that we have installed a flow meter and continuous sampler at our discharge point to measure the total volume of water flowing through and out of the system. This was suggested by Florida authorities at the Florida conference held last October or November--last November. This was suggested by the Florida authorities to provide a more accurate measurement of treatment effectiveness.

Our treatment system is new, and we are still monitoring and adjusting it for maximum operating efficiency and maximum reduction of foaming constituents.

I might add that there has been a marked improvement in water quality in both the creek and the bay since our new system began operating. Several residents of Perdido Bay, both Florida and Alabama residents, have told us the water is much improved.

At the Florida pollution control meeting we showed a series of color slides of our treatment system as it was operating and we would like to show them to the conferees as a matter of information.

MR. WHITE: Let me interject something here. We will just use these as visual aids and won't include them in any record that we keep. Is that satisfactory?

MR. HUDSON: This should be satisfactory. I would like to request, Mr. Chairman, the record will be kept open for--I would like to put in a couple of these letters that we have received which I do not have with me at the time, I would like to insert those in the record. Will the record be held open?

MR. WHITE: If you are requesting it, we will keep the record open for that.

MR. HUDSON: I am so requesting, yes, sir.

MR. WHITE: How long do you need, 15 days?

MR. HUDSON: Fifteen days will be enough.

MR. WHITE: We will keep it open 15 days to receive the letters.

MR. LEVIN: Isn't there any way that you could get those letters, get them during the lunch break and get them back here? I would like to hear them, if it is possible. If it is not possible, why, then--

Because I am afraid our recommendations are going to come out rather rapidly and I don't know that the record is going to make any difference being left open 15 days.

MR. HUDSON: I can attempt to, Mr. Levin.

MR. LEVIN: You can either do that or call the plant and have them read it to you, if you don't mind doing that, and report back to us after lunch, because I would like to hear them.

MR. HUDSON: All right, very good.

MR. WHITE: How many slides do you have?

MR. HUDSON: Very, very few. This is not going to take very long, John, and you can stop us at any time.

MR. WHITE: I am not concerned with that. I am just thinking about getting some of these into the record.

They are color slides?

MR. HUDSON: Yes, sir, they are color slides.

MR. WHITE: Let us just view them and then make a decision.

MR. HUDSON: All right. Should you request them to go in the record, we will be glad to provide the prints.

All right.

...Slides...

Slide 1. This is the in-plant effluent which is entering into the first part of the system.

This is an automatic weir to measure the water and to automatically sample the effluent going into the treatment system.

This is the new primary settling pond which was put into operation this year, around the middle of the year.

That first pond, this is a second picture of it. We are looking north toward the mill. This pond has a retention time of the total effluent of approximately 30 hours.

This is the discharge from the first pond. The settleable solids have been removed at this point.

This is going into the aeration ponds. The mechanism of removing the BOD involves a microorganism and oxygen and they have to be fed, so this is the part of the feeding system.

This is one of the egg beaters or aerators. There are 15 of these. Each one has 100 horsepower applied to it.

This is another view and you can see in the foreground another one of the continuous samplers and there is a weir there which measures that.

This is coming down from the riffles, the discharge from the ponds going into the stilling pond.

This is the final discharge prior to the Kings Field Road. Now, this is what most people see when they drive by there. And I might point out that this is a relatively new installation which was put in at the suggestion of the Florida authorities who wanted us to measure and sample automatically all of the discharge rather than just what was going into the system. This has been in operation relatively--oh, I guess about four weeks, maybe three weeks.

MR. WESTMARK: The pictures were taken yesterday morning.

MR. HUDSON: I beg your pardon?

MR. WESTMARK: The pictures were taken yesterday morning.

MR. HUDSON: Oh, yes, the pictures were taken yesterday morning.

This is an overall view of that same picture you just saw.

This is just south of Kings Field Road taken from the bridge. You can see the foam which has been generated through the spill and running through the riffles under the bridge there. Incidentally, this is still St. Regis property.

All right, this is a picture after you have gone down about a mile and a half from the first area. This is at the St. Regis Road, the bridge, the public crossing.

MR. WESTMARK: That is all.

MR. HUDSON: This concludes our films, Mr. Chairman.

MR. WHITE: Thank you, Mr. Hudson.

These are very interesting and I think they are helpful, but if you are amenable we just won't include them in the record.

MR. HUDSON: All right, sir, that is perfectly agreeable with us.

Our procedure at this point, we would entertain some questions if you would care to and with your permission I have a number of our technical staff and engineering staff here who are far more knowledgeable about the details of some of these things than I am.

MR. WHITE: We are very informal here and we do only ask that you identify a person who comes forward to answer a question that you feel someone else should have.

MR. HUDSON: All right. And we have the second part which will report on the other recommendations which will be given by Mr. Miller, which may answer some of the other questions. But we will field those as they come to us.

MR. WHITE: O. K., fine.

Now, I know everybody has got questions. I think Mr. Levin--

MR. LEVIN: Won't it be better to wait until the entire thing goes in and then see if we have got any questions?

MR. WHITE: Let's go off the record a minute.

(Off the record.)

MR. WHITE: Let's go back on the record.

Because we don't want to interrupt the continuity of this thing once we get a Q and A session going, I think it would be better if we recess now for lunch and come back at 1:30 to proceed with the presentation.

With that we stand recessed until 1:30.

(NOON RECESS)

AFTERNOON SESSION

WEDNESDAY, JANUARY 26, 1972

(1:30 o'clock)

MR. WHITE: Let's go back in session.

If all of you were here this morning when I made the opening statement, you will recall that I said that we were undecided as to whether or not we would develop conclusions and recommendations. We have discussed this in a little more depth during the break and we feel it is warranted and that we should come out with revised conclusions and recommendations.

Now, this brings about another problem. If we do, and we will, providing we survive, we won't have them ready to read until in the morning at 9 a.m.

And a thought occurs to me. Let's go off the record just a minute.

(Off the record.)

MR. WHITE: Let's go back on the record.

I have been informed that we can have the room in the morning for a brief period of time, so we will do as we did with respect to the Escambia conference that we just got through with, come back at 9 a.m. in the morning for a presentation of the conclusions and recommendations.

Mr. Mauriello, I guess we should proceed with the Florida presentation.

MR. MAURIELLO: I believe that we were in the St. Regis situation. Mr. Hudson was going to introduce--

MR. LEVIN: The man who doesn't stutter.

MR. TRAINA: Mr. Hudson, before you continue, would you prefer that you go through your presentation before we direct questions?

MR. HUDSON: As the conferees--

MR. WHITE: Actually I think we should.

MR. HUDSON: All right.

MR. WHITE: I would like to hear the whole thing and then if you would stand back with, you know, whoever you would like to assist you, Mr.Hudson, then we will get into it.

MR. HUDSON: All right, fine.

The next part of our program will be addressing ourselves to the final recommendations of the conference last year relative to carbonaceous matter, color removal, et cetera, and Mr. Roy Miller, our Director of Research Development, will speak.

ROY L. MILLER, MANAGER
RESEARCH & DEVELOPMENT
ST. REGIS PAPER COMPANY
CANTONMENT, FLORIDA

MR. MILLER: Mr. Chairman, conferees.

R. L. Miller

My name is Roy L. Miller. I am Manager, Research & Development, for St. Regis Paper Company. If I could have my first slide, please, Frank.

St. Regis Paper Company--

MR. WHITE: I might interject something here too.

MR. MILLER: Yes, sir.

MR. WHITE: Since we are going to be getting this record in a little better condition, I guess I could say, would it be possible, and I don't expect to reproduce these pictures or the pictures that were presented previously in the final transcript, but I would like to make it a part of the official record as an appendix if you could give me copies with labels on the photographs. Will that be possible?

MR. WESTMARK: We can make the slides for you.

MR. MILLER: The ones which are pertinent, other than photographs which are similar to Mr. Hudson's photographs, are simply of general interest at the tail end of my talk. These slides that I am using are all reproduced in this copy that we have. Would that serve your purpose?

MR. WHITE: That would serve our purpose for that, yes. Let's go off the record a minute.

(Off the record.)

MR. WHITE: Let's go back on the record.

Then just for clarification, we will accept these prints into the record as an exhibit as I outlined previously, because the quality of them might be difficult to reproduce, and we will just then leave it as we had it before on the photographs. We will just leave them out of record. They were very helpful and we appreciate the presentation, but that will simplify the logistics of this.

(The above-mentioned Exhibit, marked Exhibit 2, is on file at the office of the Environmental Protection Agency, Region IV, Atlanta, Georgia.)

MR. MILLER: May I proceed, Mr. White?

MR. WHITE: Please proceed, yes.

MR. MILLER: St. Regis Company under contract and funded jointly with the Water Quality Office of the Environmental Protection Agency, is currently developing an effluent treatment and reuse system for kraft pulp and paper mills. The program is aimed at demonstrating the technical and economic feasibility of large scale water renovation. Our ultimate objective is to achieve an essentially closed water cycle for the kraft mill.

Second slide, please.

This program is divided into two major parts. Part I deals with effluent treatment with activated carbon. This is the part of greatest interest to this conference and with which this progress report is primarily concerned. Part II deals with the production of activated carbon. Activated carbon must be made available at a low cost in order to treat the effluent produced by the modern kraft mill. Production of activated carbon from black liquor by a new process right at the kraft mill is St.Regis's answer to this requirement. We are developing this technology jointly with EPA under Part II.

Third slide, Frank.

This is a program overview. Part I, the effluent treatment work, was initiated in June 1969. We have completed preliminary engineering and laboratory studies and have constructed a sizable pilot plant. Shakedown of the pilot plant is nearing completion and we will be in regular pilot plant operations through about June of this year, leading to completion of this part later this summer.

Part II, the second part on our time scale, a project dealing with the production of activated carbon from black liquor, was initiated late October 1971. We are now in the initial phase of pilot plant design. This part is scheduled for completion in the spring of 1974.

Before last October, and actually dating back as far as 1964, St. Regis has had a very substantial research and development program in the recovery of pulping chemicals from black liquor, as well as in the area of activated carbon. These programs are continuing as part of the integrated $2.5 million program,of which the EPA share is $878,000.

Next slide, Frank.

I will now report in more detail on Part I, the effluent treatment with activated carbon. This slide presents a project outline and schedule. We first surveyed the available information on effluent treatment and reuse. We gathered information in our own laboratory and went through an engineering analysis to determine if an essentially closed system is feasible in concept. We selected the three most promising approaches and designed and built a pilot plant to test these concepts. At the same time, the pilot plant will provide information essential for full scale application of these treatment processes by St. Regis and others in the kraft industry. The objective of St. Regis and EPA in this pilot plant is to demonstrate the feasibility of new technology. Its application to specific mills, including the Pensacola mill, will require additional applications studies and much engineering, as would any project of similar magnitude. This is, of course, not part of the research and development program under the present EPA grant.

R. L. Miller

The survey of existing information and practices was carried out in the second half of 1969. We have prepared a survey report which we expect EPA to publish separately from the rest of this study within the next several months. This report is now in its final editing stages. I will briefly summarize the report.

Next slide, Frank.

Reuse of in-plant streams is already practiced to a considerable degree throughout the kraft industry. Reuse of total mill effluent is not being practiced. This capability is the ultimate objective of our project. The fact that in-plant streams are being reused extensively is made possible by matching quality of specific effluents, as is or after simple treatment, with the quality requirements of specific use areas. This practice is similar to the suggested use of our domestic bathwater for lawn watering or toilet flushing. Efficient water utilization and internal reuse and recycle have already brought the average use down to about 27,000 gallons per ton of pulp, including bleaching wastes, from an amount that has been estimated would otherwise be about three times as much. In some of the more recently constructed mills, use of as low as 10,000 gallons per ton of unbleached pulp is being achieved. Further reductions to as little as 5,000 gallons might be achieved by similar means in mills of the future. I want to emphasize that these dramatic reductions are dependent on design features incorporated in new mill construction. These by and large are not simple add-ons by which existing mills could achieve the same results.

Most mills were using primary treatment when we made our survey and slightly under 50 percent of the southern kraft mills were using secondary treatment, that is, biological oxidation of their effluents. The percentages have, of course, increased since then.

In the area of activated carbon treatment of effluent, our survey showed that some work had been done on a laboratory and small pilot plant scale, indicating that activated carbon would remove high percentages of color, total carbonaceous matter and BOD from kraft mill effluents, particularly when used in conjunction with biological oxidation, lime treatment, or both. However, the high cost of activated carbon had been in the way of concerted attempts to pursue its potential in terms of pollution abatement.

I would like to point out again that St. Regis's approach to the use of activated carbon differs from those reported by others in two important aspects, namely in producing a low-cost activated carbon at the mill site and in treating the total mill effluent for reuse rather than disposal, thus combining the benefits of pollution control and water conservation.

Next slide, Frank.

We have completed Phase I of our laboratory studies, which provided information required for the decision whether or not and how to proceed in the pilot plant. Of course, laboratory work is continuing primarily in support of on-going pilot plant work, as indicated here under Phase II.

Next slide, Frank.

This is an outline of the laboratory studies and the steps that had been taken. This slide sketches in some more detail the specific objectives of our Phase I laboratory work. We characterized several in-plant and total mill effluents and their response to treatment by activated carbon, lime, and biological oxidation and various sequences of these basic treatment steps. We concluded that the route to an essentially closed water system having broadest potential was via the treatment of the total effluent from the mill, excluding the bleach plant effluent because of its chloride content. Recycling of chlorides could lead to safety problems in the operation of chemical recovery boilers. Using activated carbon either alone or in conjunction with lime treatment or biological oxidation, we found that over 90 percent of the color can be removed from the effluent of a kraft mill. Removal of total carbonaceous matter was 80 percent to 95 percent, and I emphasize I am talking about the laboratory results. These percentages depend on the amount of carbon with which the effluent is contacted and on the treatment sequence used. We have found also that there are carbonaceous compounds in our effluents which are difficult to remove with activated carbon. Although 80 to 95 percent removal may be shy of the ultimate goal of zero discharge, we consider the treated water of sufficient quality for reuse purposes. It follows that by discharging perhaps only 10 percent of this treated water, we would effectively reach a high degree of removal of color and carbonaceous matter.

We evaluated different commercially available activated carbons to select one carbon for our pilot plant and at the same time assure that our own laboratory was producing experimental carbons of comparable characteristics.

Next slide, Frank.

I would like to digress for just a moment. This is an artist's conception of the pore structure that makes activated carbon do its work. Just any charcoal is not activated carbon. The internal surface area represented by the lining of these pores attracts the contaminants present in the water.

The fuzzy more dim blobs are representing impurities in water. A good carbon has an internal surface area of about 900 square meters per gram and costs about 25 cents per pound.. This tremendous surface area may be easier to visualize if we call it 100 acres per pound. But it takes these 100 acres to hold about one-third of a pound of carbonaceous material.

Next slide, Frank.

These photographs of St. Regis experimental carbon were taken with an electromicroscope, on the right at 500 times magnification, on the left at 2,000 times magnification. Rather sophisticated equipment and methods are required in this line of carbon investigative work. And you can see the tremendous surface area and pore structure in these typical carbon particles.

Next slide, Frank.

Coming back to our laboratory studies, we also evaluated several different processes in which the carbon itself could be used, among these a novel one that we have developed, and incidentally applied for patents on behalf of EPA.

With the information from our survey and from the laboratory in hand, we undertook a careful engineering analysis to set the course for our pilot plant.

Next slide, Frank.

As the schedule indicates, we completed construction of the pilot plant by November 1971. We are nearly complete with shakedown operations. Round-the-clock operations will begin within a week or two, to be completed in July.

I will show you some color pictures of the pilot plant in a few minutes. First, on the next slide, Frank, please.

This is a flow sheet diagramatic representation of what is in the pilot plant. I would like to explain what we will be able to do. We have a pond at the top of the diagram which we can use for biological oxidation and for clarification of effluent from our Pensacola No. 2 mill where only unbleached pulp is produced. We have a lime treatment system, the second row of equipment on that diagram, including the required carbonation and pH adjustment following lime addition. Then we have two different carbon adsorption systems. The first consists of four columns, each 3 feet diameter by 15 feet high and filled in operation with a 10-foot bed of coarse granular activated carbon. Effluent would usually flow through two or more of these columns in series. The other system consists of a series of tanks where effluent is contacted with a suspension of fine activated carbon. We hope this system will turn out to be a lower-cost system than the standard column configuration.

The pilot plant is designed for an effluent flow of 30 gallons per minute or 44,000 gallons per day. The entire pilot plant is instrumented and we expect to run it 24 hours a day with only eight hours of workmen in attendance.

Next slide, please, Frank.

Using the four basic treatment steps which I discussed earlier that we looked at in laboratory, we will test the following three treatment sequences:

First, a primary clarification followed by carbon adsorption.

Second, a lime treatment and clarification carried out simultaneously followed by carbon adsorption.

Finally, primary clarification, then biological oxidation, and finishing off with carbon adsorption.

In each of these sequences we plan to test the two carbon contacting systems side by side.

Now I would like to show four or five slides that will give you some view of what the pilot plant looks like.

Frank, would you flip to the next one? Not so fast.

MR. WESTMARK: It is the machine.

MR. MILLER: I would like to show some of the equipment being delivered. I particularly like this shot because it looks like something being delivered to Cape Canaveral. That is our lime treater and the cluster of long tubes are the carbon adsorption columns, the combination looking very much like a rocket.

Next slide please, Frank.

That is the shell of the building and one of the carbon columns being dropped into place down through the opening in the roof.

Next one, Frank.

This is an inside view, obviously during construction, clearly showing one of the carbon columns erected in the background, a polishing sand filter in the foreground.

Next one, Frank.

This is a view looking north at the plant with our retention pond or in this case being operated as an aerator lagoon in the foreground. You can see our floating aerators churning air into the effluent for biological oxidation. The main plant in the background.

One more, I think, Frank.

This is a view looking south at the entire plant. Some of the equipment is mounted outside, some of it is inside, and we are happy to say we reproduced the EPA Clean Water sign on the north end of the building.

Thank you, gentlemen. That is my presentation.

MR. WHITE: Thank you, sir.

Let's go off the record just a minute.

(Off the record.)

MR. WHITE: Back on the record.

Mr. Levin, do you have some questions?

MR. LEVIN: Mr. Miller, in laymen's terms, what you are saying, that you now are doing all of this in an effort to make all this in-house and that you will no longer discharge anything if this thing works out and you get it into operation?

MR. MILLER: No, sir, I am not so optimistic as to say that what we are doing now will result in a total recycle of effluent. We have set ourselves an objective of treating it all, reusing about nine-tenths of it, and then being forced for a number of reasons to discharge the remaining 10 percent. But the remaining 10 percent will have been treated.

MR. LEVIN: All right. Now, will you compare that for me, please, sir, with the present discharge that you have? In other words, what will that mean in view of using all these letters, BOD's and COD's and all that kind of stuff?

MR. MILLER: It should reduce, it should reduce the present level of discharge at least in half. This is hard to estimate because presently the mills are practicing biological oxidation. We are working on a sequence of biological oxidation, then something else, so my point of reference has to be what they are accomplishing now with biological oxidation. If they are accomplishing 90 percent now, we can't get but another 5 or 6 percent, probably, by further treatment. It is hard--it is difficult to--well, the reason we have the pilot plant is to try to find out.

MR. LEVIN: What in your judgment is causing the foam situation in Perdido Bay?

MR. MILLER: I frankly don't know. Our department has not been involved in the foam problem. We are a corporate group and this is a local problem. We have not been involved other than providing some analytical services.

MR. WHITE: Perhaps that should be addressed to Mr. Hudson.

MR. MILLER: You may want to call on somebody else on that one.

MR. LEVIN: He is hiding behind the board.

MR. HUDSON: Yes, I want to hide on that one.

Who would care to answer that? We have our--

(Laughter.)

MR. WHITE: We are off the record.

(Off the record.)

MR. WHITE: All right, back on the record. Let the record show that Mr. Hudson called Mr. Still. Would you identify yourself by full name and title?

MEDIE T. STILL
TECHNICAL SUPERINTENDENT
ST. REGIS PAPER COMPANY
CANTONMENT, FLORIDA

MR. STILL: My name is Medie T. Still. I am a Technical Superintendent.

MR. LEVIN: Maybe I ought to ask this question first.

First of all, do you concede that there is still foam in Perdido Bay?

MR. STILL: Yes, there is foam in Perdido Bay on occasions, I believe.

MR. LEVIN: O. K. Now go back to the other question. What do you think is causing that?

MR. STILL: I will have to answer the same as Mr. Miller. I do not know. We have analyzed foam from the bay and we found,much as the EPA lab, some constituents that could come from kraft mills. To my mind this does not mean that these constituents are what cause the foam. So I really don't know what causes the foam. The foaming constituents have not been really isolated, to the best of my knowledge.

MR. LEVIN: Why would there be--

MR. WHITE: Go ahead, Mr. Levin.

MR. TRAINA: Just one point of clarification. At the last session of this conference I believe the company reported on a consultant firm that they had retained to look into this. Are we going to hear a report based on the findings of this group? I believe it was an association called Beak? I believe at the last session of the conference you reported that you--

MR. HUDSON: This was not reported, we did not report that at the last session of the conference.

MR. TRAINA: Maybe there has been some correspondence since then.

MR. STILL: This has been some correspondence with the EPA. Yes, the company did retain some consultants to help identify the problem and just what it was. This was the T. W. Beak Associates which we retained. They completed the work this last fall. These people more or less confirmed the work that your people did, that we were the primary cause of foam. This was with the system before we started up the new system in October.

MR. LEVIN: The thing I am really trying to find out--

MR. WHITE: One at a time.

Let Mr. Levin proceed.

MR. LEVIN: I am not trying to be No. 1. It doesn't make any difference.

I am just trying to find out, do you think that there is something in the water because of previous discharge that eventually will make its way out of the water so that there won't be any more foaming based on the apparent, comparatively speaking, clean discharge that you are making--cleaner discharge you are making?

MR. HUDSON: I am not qualified to do anything but make a conjectural statement on that. I do not believe we will see all the foam gone out of this bay or any of the other bays, regardless of what we do, out of Perdido Bay or Pensacola Bay, or Escambia Bay or--

MR. LEVIN: Why not?

MR. HUDSON: There is a certain amount of natural foam which we see at all times in practically all bodies of water with a saline content.

MR. LEVIN: In other words, using a "what if", as Festus says, what if you all stopped discharging now, you still think that foam would be out there several years more to come?

MR. HUDSON: I will have to give you a personal opinion because I really don't know, but I don't think it would make one iota of difference in it.

MR. LEVIN: All right, sir.

MR. HUDSON: Now or in the future.

MR. LEVIN: Do you know of any other industry that is discharging any effluent that makes its way into Perdido Bay that might possibly be causing this--creating the problem?

MR. HUDSON: From personal knowledge I do not, no, sir.

MR. WHITE: Mr. Traina, do you have some questions?

MR. TRAINA: Yes, I would again like to ask that question about that consulting report. You say they have made their findings? Have these findings been made available--they haven't been made available, I don't believe, to EPA. Have they been made available to the State?

MR. HUDSON: No, sir, they have not.

MR. TRAINA: Do you propose to make them available to us?

MR. HUDSON: No, I don't think so. Well, we will make the findings available, not the copies of the reports.

MR. TRAINA: You indicated that the findings were the same as those of the EPA.

MR. HUDSON: I did not say the same, no, sir. I said they more or less confirmed and parallel what you found in your--

MR. TRAINA: What I was trying to do here was get our findings and I was trying to get the exact quote indicating that the constituents of the foam in the bay were the same as those discharged from the mill. Is this generally what the consultants concluded?

MR. HUDSON: Yes.

MR. TRAINA: Thank you, sir.

I have a number of other questions I would like to proceed with.

MR. WHITE: Proceed.

MR. TRAINA: To get back to the first part of your presentation, Mr. Hudson, with regard to the treatment facility, you will recall that EPA had made an in-plant survey, not an investigation in that there were no samples collected, but in-plant survey of your facilities in March of 1971. At that time a number of points were brought up by our people. I would like to ask you some questions about it.

First, the one regarding the suggestion made by our people that you consider sludge removal from your clarifiers or your ponds, I guess. What has been-- Shall I get that specific recommendation? O. K. Let me get it here.

MR. WHITE: Would you identify completely what you are reading from, Mr. Traina?

MR. HUDSON: You had better tell me what you are speaking of, Paul.

MR. TRAINA: Maybe I will answer this for the record. This is a memorandum from Ralph Scott, who is Chief of our

Paper and Forest Industries Research, EPA, in Corvallis, Oregon. This memorandum was directed to Mr. White dated May 4, and I will enter a copy of this, and I believe that this memorandum was made available to the St. Regis--

MR. WHITE: Let's go off the record. I would like to review it just a minute.

(Off the record.)

MR. WHITE: Let's go back on the record, please.

After reviewing this, this is an internal document. Mr. Traina wishes to make a point on it and we will present selected excerpts which he will read. He has identified what is the subject matter of the paper.

MR. TRAINA: O. K.

> Until the clarifier is installed, it would be better to divide the one-day primary lagoon into two parallel retention basins by a wall with suitable altered inlet and outlet structures for each section.

Was this recommendation followed through by the plant?

MR. HUDSON: You have caught me kind of cold. I do not have a copy of that or I am not prepared to answer. I don't know what document you are referring to, Mr. Traina.

MR. WHITE: Let me see if I can't clarify something on this. This is an internal document that never has been given directly--

MR. TRAINA: Well, they responded to it.

MR. WHITE: They received selected excerpts from it.

MR. TRAINA: I see. O. K.

MR. HUDSON: Mr. Scott was not our consultant, incidentally.

MR. WHITE: If you will hold on just a minute, Mr. Hudson.

If you will identify this letter and the selected excerpts, I think that will be fine, because the company has this in their possession.

MR. TRAINA: All right. I am not a lawyer, see, and I have problems with the legal proceedings here.

The letter, Mr. Hudson, dated July 16 from you to Mr. White. You responded to excerpts of this memorandum which was made available to you and in that response this question of the settling lagoons and of specific recommendations made by Mr. Scott were addressed by you and you indicated at that time the following:

> We are of the opinion that a settling lagoon is essentially the same as a mechanical clarifier except in this case the retention time

and the upflow rate are both more favorable in the lagoon.

Perhaps rather than get into details, I guess what I am asking, are you having any problems with the settled material in the bottom of your lagoon being uptaken into the water column and coming through your system, your treatment system?

MR. HUDSON: No, sir.

MR. TRAINA: Do you have any data to indicate that one way or the other, sir?

MR. HUDSON: We have data from the inlet and the exit of this lagoon. I do not have it present that I could quote from it.

Do you recall any of the figures?

We do have data which indicates that it is doing what it is supposed to.

MR. TRAINA: You are not now removing the settled materials from the bottom of this lagoon?

MR. HUDSON: No, sir.

MR. WHITE: Before we proceed, Mr. Traina, and I am not trying to cut you off, Mr. Crockett and Mr. Mauriello I think had a question on this same point.

MR. CROCKETT: Mine was on another point that had been the previous point.

MR. WHITE: All right, we will go back to that right after Mr. Mauriello views this.

MR. MAURIELLO: I just want to see the letter and see what we are referring to.

MR. WHITE: Let's go off the record a minute.

(Off the record.)

MR. WHITE: Back on the record.

Do you have any questions, Mr. Mauriello?

MR. MAURIELLO: No, not right now.

MR. WHITE: Mr. Crockett indicated that before we got too far away from it, on the last question that we went into that he has a question that he would like to ask.

If you would, Mr. Crockett.

MR. CROCKETT: Mr. Hudson, if I remember correctly, the conferees were advised that St. Regis was retaining this consultant firm, Beak, I believe is the name, and you were asked a few minutes ago by Mr. Traina if the report would be made available. Since we were told you were going to retain the consultant, can you not furnish the conferees with the summary and conclusions made by your consultant?

MR. HUDSON: Let me refer--

MR. CROCKETT: Not the full report, but at least a summary of the report and what conclusions they came to. You have said that they supported the findings of EPA and I believe you said it indicated that St. Regis was the primary cause of foam in Perdido Bay. I just wondered if you could not make available to us just a summary and conclusions or summary of the report in abbreviated form?

MR. HUDSON: Can you recess just a second? Let me discuss this with some of our people. I do not have the report available.

MR. WHITE: All right, let's go off the record.

(Off the record.)

MR. WHITE: Let's go back on the record, please.

MR. HUDSON: I have conferred with our people and because of the fact that this report is ancient history, the situation is entirely different today than at the time this study was made and the time the EPA made their study over 15 months ago, it is no longer relevant and we choose not to make it available.

MR. WHITE: Of course that is your decision to make, Mr. Hudson.

MR. HUDSON: Yes, sir.

MR. WHITE: Do any conferees have any comments on this?

MR. LEVIN: I have got one, but it couldn't be printed. (Laughter.)

MR. CROCKETT: Well, I will say about the same thing as Mr. Levin and let it pass.

MR. WHITE: Very good.

MR. LEVIN: If it is old history I don't know what difference it would make to let us see it.

None of my business.

MR. WHITE: Mr. Traina, do you have additional questions?

MR. TRAINA: Another point that was brought up to which you responded in this letter of July 16, sir, regarding aeration of your lower pond, and you indicated that it is possible that experience may dictate the addition of aeration at this location. Have you in fact done that yet?

MR. HUDSON: No, we have not. The data from our treatment system indicates that we need no further aeration. We have considerable excess of aeration.

MR. TRAINA: Since October 22 you have had your treatment facilities?

MR. HUDSON: Yes.

MR. TRAINA: Do you have a, let me ask this, weekly average BOD loading from your facility since that time?

MR. HUDSON: Since October 22?

MR. TRAINA: Yes. Do you keep records of this?

MR. HUDSON: Oh, yes, we have records. I do not have them available. They are well within the criteria set by the conference.

MR. TRAINA: You consistently--

MR. HUDSON: Consistently.

MR. TRAINA: --produce an effluent less than the 5,100 pounds a day?

MR. HUDSON: Yes.

MR. WHITE: Go ahead, Mr. Traina.

MR. TRAINA: Another question that I believe came up during the last conference and was further discussed with you during this March visit by Mr. Scott regarding the capacity of your evaporators and furnaces. Has the company addressed itself to this at all?

MR. HUDSON: Let me let our corporate engineering group answer that. I will ask our Manager of Engineering Services, Mr. Ross Emery, to answer that one.

St. Regis - General Discussion

H. ROSS EMERY

MANAGER-ENGINEERING SERVICES

ST. REGIS PAPER COMPANY

JACKSONVILLE, FLORIDA

MR. EMERY: I am Ross Emery, Manager of Engineering Services, Corporate Engineering.

We have submitted a plan which becomes part of the air plan which would include replacement of the equipment that you asked about, recovery boilers and evaporators.

MR. TRAINA: What is the implementation date for that replacement?

MR. EMERY: The plan was approved, given tentative approval on July 7 by the Florida Department of Pollution Control. We ran into some problems on the air implementation plan and we have not as yet developed specifications for the major portion of the equipment in that plan, the major portion of the equipment being the recovery boilers.

MR. TRAINA: Could you give us an estimate, sir, if you do replace these facilities what kind of reduction would you expect in your BOD, TOC, color and foam constituents?

MR. EMERY: I wouldn't venture a guess that there would be a significant reduction over the reductions that have been accomplished by the in-plant changes now.

MR. TRAINA: You say it would be or would not be?

MR. EMERY: Would not be.

MR. WHITE: Let me interject a question here.

As you know, in the recommendations, two reporting dates are coming up very soon, February 15, one relating to carbonaceous wastes, the other relating to color, a report on the feasibility of color removal. Now, you have made a report concerning your pilot research program. I assume that this is in response to the requirement in the recommendations that you report by February 15 there, is that correct?

And secondly, do you plan or where do you stand on these other two reports relating to carbonaceous material and color removal?

MR. HUDSON: These reports will be submitted at the date. Mr. Miller has given the progress report to date on those matters.

Would you care to answer that, Roy?

MR. MILLER: Let me clarify that. The reason I pointed out that our survey or state of the art report was in the final editing stages is because we would consider that what is in that report spells out quite clearly the current feasibility of accomplishing color removal and the removal of carbonaceous materials. I can't hand you that report today because--

MR. WHITE: I want to get a copy of the recommendations. I think we have got a misunderstanding.

MR. MAURIELLO: I have got them right here.

MR. CROCKETT: Here they are.

MR. HUDSON: I have a copy of it.

MR. TRAINA: He has them right here.

MR. WHITE: The question that I proposed with respect to carbonaceous waste and color is separate and apart from the research project.

MR. MILLER: Yes, sir, I understand that.

MR. WHITE: Are you saying that you answered the questions?

MR. MILLER: I am submitting that these other questions will be answered by the survey report which was generated in the early stages of our R and D program, because essentially that is what those two things are saying, asking the company to state what is the feasibility of color removal, what is the feasibility of removal of carbonaceous materials.

MR. WHITE: You are saying, then, that this is tied part and parcel into your research project?

MR. MILLER: These subjects were covered very thoroughly when we made our state of the art survey in order to launch into the R and D program, so I believe that the survey report, just as soon as we can get it through the publishing channels, would fulfill those requirements of submitting such a report.

MR. WHITE: And then we are talking about this report in July, is that what you are saying? Or what was the date you gave me?

MR. MILLER: No, sir, it is in the final editing stages now in St. Regis and will be done by the end of this week. It will go to Mr. George Webster in your Washington offices and I cannot estimate how long it will take EPA to produce. They have to release it, of course, as I think you understand.

MR. WHITE: Mr. Mauriello.

MR. MAURIELLO: I am confused. Let's see if we can straighten it out.

One of the recommendations of the last conference was that St. Regis Paper Company would present and submit a plan of abatement for carbonaceous wastes to the conferees by February 15, 1972. Your progress report, does it speak to this plan that will be submitted?

MR. MILLER: No, sir. I am only talking about feasibility.

St. Regis - General Discussion

MR. MAURIELLO: The other recommendation is that St. Regis shall report to the conferees by February 15, 1972, the findings of methods of color removal. I assume your progress report speaks to this?

MR. MILLER: Definitely.

MR. MAURIELLO: And the third one is that by February 15 there shall be an application for a water renovation research project, which I assume from your schedule you are ahead of schedule on because you are down the road and you have that research project going already and it is not just in the application form.

MR. MILLER: Oh, no. No. This has been an active project since--

MR. MAURIELLO: That is what I am saying--

MR. MILLER: --June of 1969.

MR. MAURIELLO: --that you have surpassed that particular deadline, but there will not be--

Or let me ask this question this way. Will there be a plan for abatement of carbonaceous wastes submitted by February 15?

MR. MILLER: Not by R and D, no, sir.

MR. MAURIELLO: Maybe I should direct my question to Mr. Hudson.

MR. WHITE: Maybe Mr. Hudson will answer.

MR. HUDSON: I will have to direct that to our engineering group, Dick Cashen, who is in our Environmental Group, Corporate Engineering.

RICHARD CASHEN
CORPORATE ENGINEERING
ST. REGIS PAPER COMPANY
JACKSONVILLE, FLORIDA

MR. CASHEN: My name is Richard Cashen, C-a-s-h-e-n, Corporate Engineering in Jacksonville.

My statement right now is not intended to be the report due February 15.

MR. WHITE: We understand. But we were just trying to understand whether or not a report is forthcoming that addresses itself specifically to that recommendation.

MR. CASHEN: Based on all the information that has been generated by the R and D report and all its literature searches, just in general and in brief our plan for reducing carbonaceous material would include the accomplishments of the biological treatment and the future developments that may prove feasible in additional, say, color removal, which would also remove additional carbonaceous material.

MR. WHITE: Mr. Crockett, I believe you had a question.

MR. CROCKETT: Mine went back to Mr. Miller, goes back to Mr. Miller.

As I understand it, the part on color removal will be made in this--oh, I don't remember what you call it--but progress report--

MR. MILLER: Yes, sir.

MR. CROCKETT: --that will be submitted to EPA--

MR. MILLER: Yes, sir.

MR. CROCKETT: --or has been. Did I understand that your pilot plant system excludes bleachery waste?

MR. MILLER: Yes, it does.

MR. CROCKETT: In your particular mill, is bleachery waste your principal color producer?

MR. MILLER: I honestly do not know whether it is or it isn't.

MR. CROCKETT: In some mills it happens to be that way?

MR. MILLER: In some mills it can be the major producer.

MR. CROCKETT: Well, if this R and D project proved itself, then you have already told us that you would not be totally recycling in your waste flow and thereby eliminating any discharge. But your bleachery waste would still have to be discharged?

MR. MILLER: As far as the scope of our present--

MR. CROCKETT: Yes.

MR. MILLER: --program, yes, sir. Now, we eliminated bleach plant effluent from our study after due consideration along with the EPA project officer and decided that the bleach plant was outside the scope of our work because of the chloride problem, our objective and our assignment being to try to find a way to use this back as general process water.

Now, EPA--well, other people are carrying on programs specifically aimed at bleach plant effluents and specifically aimed at the chloride problem, some of these being sponsored also by EPA. So it is outside the scope of our assignment, our mission with EPA, but it is not outside the scope of the total EPA program.

I would expect at some time in the future there would be a marriage of technology that would allow the bleach plant to be included also in a recycle scheme. It is not here yet.

MR. CROCKETT: Thank you, sir.

MR. WHITE: Mr. Levin.

MR. LEVIN: Mr. Hudson, did you hear the gentleman from Alabama request that the EPA make an in-plant study of St.

Regis just like they did at Container Corporation? Were you here this morning?

MR. HUDSON: Yes, I heard that.

MR. LEVIN: Do you have any objections to that?

MR. HUDSON: I would want to discuss the matter and see what they did want to look at, Mr. Levin, but I would think not. Would this be the same sort of--in other words, I wouldn't want anybody looking at my income tax, for instance.

MR. LEVIN: I don't think they want to look at your income tax. (Laughter.)

MR. HUDSON: Well, I mean I want to look at the scope of these things.

MR. LEVIN: This job may have made me a little paranoid anyhow, but I am a little bit worried why it is that you won't show us the report and now you want to consult before you let these people go ahead and look at your plant, and I can't understand unless you are trying to hide something. I don't understand it.

MR. HUDSON: Well, I will be very glad for you and Mr. White to come--

MR. LEVIN: Not me. I wouldn't even know a paper plant if I was to see it out there in the middle of that floor.

MR. HUDSON: Well, I have no particular objection and

I am sure our people would not.

MR. LEVIN: O. K.

Let me ask you this also. Were you or any of your people here yesterday or the day before when testimony was being presented about Container Corporation?

MR. HUDSON: I was not. I think Mr.--no, I don't believe any of our people were here.

No, they were not.

MR. LEVIN: Is it possible for you to be able to--you know, going back to our meeting out in Gulf Breeze back last fall, I believe it was stated that the source of the stream that feeds into your plant, there is no way you can go upstream and check what the condition of the stream is before you take it in and after you take it in or can you do that?

MR. HUDSON: We cannot do that because all of our water is from wells, groundwater.

MR. LEVIN: This picture that you show, you said this is water coming into the plant, where is that water coming from?

MR. HUDSON: That is coming into the treatment plant. That is the discharge from the mill into the treatment plant.

MR. LEVIN: Oh, I see. There is no way you could check to see what the condition of the intake water is as opposed to how far it is downstream? You see, Container came in here, and I hope I am not out of order to talk about what happened day before yesterday--

MR. WHITE: Well, we are very informal in our procedure, Mr. Levin.

MR. LEVIN: Thank you.

They came in here and said, now, look, here is the way the stream was upstream and when you get down here along about the highway or something it is right back in the same condition.

Is there any way that you could make such a comparison so that we could find out just exactly what, if anything, St. Regis is doing?

MR. HUDSON: Well, all of our water is coming from the ground. There would be no stream if we were not pumping the water from the ground.

MR. LEVIN: Well, can you test all those letters in that particular body of water from what you are taking out from underground, how many BOD's are already in it and COD's and TOC's?

MR. HUDSON: What do you mean, the ground with the well water?

MR. LEVIN: Yes.

MR. HUDSON: Oh, yes, we can test that.

MR. LEVIN: Well, the thing I am trying to get at is I am trying to compare this plant with the Container Corporation, see. I just want to find out if there is some way it can be tested to determine just exactly what effect you all are having on the additions into the Eleven Mile Creek, if any. In other words, if you all come in here like Container Corporation did and say, well, now, we are taking the water in and it has got X number of all these letters in here now and then three miles downstream we are right back to where it was, then I think you all ought to be given the same consideration Container Corporation was given.

MR. HUDSON: Well, the source of our process water is entirely different from Container, Mr. Levin. As I understand from what you say, and I am not familiar, but apparently they are taking surface water, treating it and then putting it back into the stream. Is that correct?

MR. LEVIN: I think that is right.

MR. CROCKETT: That is correct.

MR. HUDSON: Which is an entirely different situation than we have. We are not using the surface water. All ours is groundwater.

MR. WHITE: This gets to the point that I was making earlier, Mr. Levin, that we have two different systems, receiving, the entire process. It is very difficult to extrapolate something from one plant to the other; they are individual to a degree.

Mr. Crockett, did you have a comment?

MR. MAURIELLO: No, I think just to clarify it for Mr. Levin.

MR. WHITE: Go ahead, Mr. Mauriello.

MR. MAURIELLO: Eleven Mile Creek is the discharge of St. Regis Paper Company.

MR. LEVIN: I know that, but they have got to be getting the water from somewhere.

MR. MAURIELLO: The water comes from the ground, from wells.

MR. LEVIN: Well, when that water comes out of the ground does it have all these letters in it? (Laughter.)

MR. WHITE: Does it have what?

MR. LEVIN: These BOD's and COD's and XYZ's and other things like that.

I am serious. I would like to know.

MR. WHITE: Would you care to answer that, Mr. Traina?

MR. TRAINA: Generally groundwater does not have BOD's and probably not TOC's. It has very little organic matter. It is mineralized.

MR. LEVIN: So then what it boils down to is the fact that Container is using water that is dirty already. They get the advantage over St. Regis because they are using clean water. Is that what it boils down to? (Laughter.)

MR. TRAINA: That is your conclusion.

MR. LEVIN: I am not asking for amusement. I want to know.

MR. WHITE: You raise a basic philosophical point and it is of concern to every enforcement area in the water field and I think I should address just a few statements to it.

Container Corporation aside, if there is any plant getting its water from a stream with some form of contaminant or some substance that is undesirable, as a general policy I think I can say that EPA feels that the company or whoever should not be required to take out anything they didn't put in.

MR. LEVIN: Which goes back to what I am saying, as long as they are using dirty water they are O. K.

MR. WHITE: Well,again as Mr. Traina said, you said it, but I don't quite see how this--

Well, I don't see the point that you are driving at, Mr. Levin.

MR. LEVIN: The point I am driving at is that here we have got two paper mills, we have got St. Regis and we have got

Container Corporation. Now, quite honestly, if you want to tell it like it is, the way it seems like to me is that because the Escambia Bay, which is in Florida, is receiving the water coming out of Container Corporation, we are treating them differently than what we are trying to treat St. Regis.

Now, quite frankly, I am all for getting St. Regis out of Eleven Mile Creek as long as you can, but I resent the more I sit here--and frankly,I wish I had heard this Monday and heard Container Corporation today--I resent, quite frankly, the fact that yesterday we sat up there in the hotel room praising Container Corporation for only dumping 5,000 things into the water, but merely because they are using water and coming into the State of Florida and we are supposed to stand up and yell hip hooray because they are in Alabama,while at the same time we are sitting here tearing these people to pieces for being in Florida dumping into Alabama.

Now, I am not saying that we shouldn't tear them to pieces. I am not saying that St. Regis shouldn't be treated that strongly. But I am also saying that what is good for the goose is good for the gander.

That is basically what I want to say.

MR. WHITE: Let me interject something and then, Mr. Traina, I would like for you to add to it.

MR. LEVIN: Let me just add one more statement. In other words, if St. Regis has got to go to a self-contained plant, I don't think merely because Container Corporation is able to test what they have done above stream with what they have done below stream they ought to get out of having to do the same thing.

MR. WHITE: Let me answer that--

MR. LEVIN: They ought to be required to get out of the river just like St. Regis ought to be required to get out of the river.

MR. WHITE: Let me answer your last statement first.

Nothing has been concluded yet concerning a closed system. Now, this research project is ongoing with EPA's support to see if this is feasible. As soon as we get this report, then determinations could be made if this would be applicable. If it is applicable I think it would likely be applicable industrywide.

MR. LEVIN: That is all I wanted to say, that is all I wanted to hear you say.

That is all.

MR. WHITE: That clarifies that?

MR. LEVIN: That helps. Now I can go to sleep.

MR. WHITE: Mr. Traina, do you have an observation?

MR. TRAINA: Yes, I do have an observation.

First it is not the intent of EPA or either of our predecessor agencies to get on anybody who is attempting to arrive at clean water. The requirements--

MR. LEVIN: Paul, I didn't mean that personally.

MR. TRAINA: No, I think the record needs to be made clear and I should have opened my comments to Mr. Hudson here. As Mr. Hudson read, EPA has recognized the work of St. Regis. As a matter of fact,our Administrator himself has recognized reductions produced by St. Regis, and I really wanted to say in my opening that I was encouraged to hear Mr. Hudson's comment that when we came out with this 5,100 pound requirement I know there was a lot of concern among the plants, and as he indicated they went out to get after that and in fact exceeded that and they are to be complimented and I think we have done that officially.

The gist of the comments I made, you know, we are always trying to reduce waste loadings to the maximum extent possible and there were some specific technical points that had been addressed in our visits with the plant and I was getting a response from that. I think Mr. Hudson would agree, I know he would agree, that it is the aim of all of us in this business, regardless of which side of this table we are sitting on, to reduce our waste loading to the best practical way we can and we have made some suggestions and plant had adopted many of these suggestions. As a matter of fact, one question I was going to ask Mr. Hudson, I will ask him now.

You had proposed 14 points to us at one time. I was going to ask you the question if these 14 points--

MR. WHITE: If I may interject something, that has been sent out to all the conferees, Mr. Traina.

MR. TRAINA: There were some dates, though, regarding October 31, 1971, as completion dates for some of those items. Have these--

MR. HUDSON: All items have been completed.

MR. TRAINA: Fine. Fine.

MR. WHITE: Let's go off the record for just a minute.

(Off the record.)

MR. WHITE: Back on the record.

I would like to clarify this.

At the last conference this program was developed, the 13 or 14 point program, I forget which now, the company has complied, this information was distributed to all of the conferees, and Mr. Traina's point is he would like to get this into the record.

MR. TRAINA: Well, also the fact that in that status report there were some of those items to be completed by October of 1971 and you just told me those have been completed.

MR. HUDSON: Those have all been completed and all have been reported to your office.

MR. TRAINA: To get off this, I would just like to ask Mr. Miller some questions again about his presentation here.

This pilot plant, Mr. Miller, is 44,000 gallons a day?

MR. MILLER: Per day, yes, sir.

MR. TRAINA: What is the total flow of the mill?

MR. MILLER: Twenty-nine million.

MR. TRAINA: Have you yet progressed to the point where you have done some scaleup studies from going from 44,000 gallons to, what is it, 29 million gallons a day? Has your engineering proceeded to that point yet?

MR. MILLER: Not in any detail. This quite understandably is one reason for scaling up from the laboratory bench to the 30-gallon-per-minute pilot plant. However, rough order of magnitude engineering calculations have been made as to what it might take in terms of acreage, what it might take in terms of dollars to put a hypothetical plant onto such a system.

MR. TRAINA: Are you in a position to say now, sir, whether or not it is technically feasible to put such a plant at the present St. Regis site at Cantonment?

MR. MILLER: We won't know that until next summer.

MR. TRAINA: O. K.

In your presentation you talked about your two parts, the first part dealing with effluent treatment with activated carbon and, of course, the second part is the part that EPA is jointly funding with you and that is developing activated carbon?

MR. MILLER: EPA is involved in both parts.

MR. TRAINA: Oh, in both parts?

MR. MILLER: Yes, sir.

MR. TRAINA: Has the company made any--let me ask it another way. Will the results of the second part influence the company's decision to go to activated carbon? In other words, will you need to come up with a viable production method for activated carbon black liquor before you can treat your effluent with activated carbon?

MR. MILLER: We think from an economic point of view that this will be a necessity.

MR. TRAINA: It is an economic consideration?

MR. MILLER: I could be proven wrong if our results as far as quantities of carbon required, et cetera, come out differently than what we anticipate. But in concept, in the beginning, guessing, you might say, how much carbon would be required, we think the economics depends upon being able to produce the carbon on site.

MR. TRAINA: Yes, sir.

MR. MILLER: We think it would be prohibitive to go out and buy coconut shell activated carbon, for instance, even if there were that much available. The whole concept is based on a low cost on-site carbon.

MR. TRAINA: I see.

Again just a comment. I am very pleased with this progress report.

MR. MILLER: Thank you.

MR. TRAINA: I think much has been done industrywide regarding a water renovation system. We get into this in many of our enforcement conferences around the country and you know we are always accused, to give a general comment here, not always accused, but there is the problem of transferring technology or research into hard concrete steel, and it is encouraging to see a project like this proceeding to the point where at least information that can be used for engineering designs and principles are firmly being established.

And with that, Mr. Chairman, I have no further comments.

MR. WHITE: Mr. Mauriello.

MR. MAURIELLO: Mr. Miller, I would like to explore this Phase I a little bit with you.

MR. MILLER: All right.

MR. MAURIELLO: This is one of the better ways of presenting a status report, so far as I am concerned. I mean it kind of lays out some time sequences on it.

But Phase I is evidently there for the development of preliminary engineering on treatment. Is this treatment in terms of color removal? Is this one of the objectives and goals of Phase I?

MR. MILLER: We set ourselves two primary standards, or whatever you want to call them. There are no published standards, no established standards that would tell us this is what the characteristics of a reusable water have to be. So we had to use some judgment, ask a lot of questions, and we arbitrarily establish our own standards.

We set two criteria that we work against, one of which is color, and the second, as a matter of convenience we use TOC, total organic carbon, because of the analytical ease with which we can follow our progress with that measurement.

MR. MAURIELLO: So your two goals, then, are reduced color to--

MR. MILLER: So looking at color, we are looking at total carbonaceous material.

MR. MAURIELLO: O. K. Also--

MR. MILLER: We look at other things too, but these are the two that we keep in mind.

MR. MAURIELLO: Right. I gather, though, that you only through Phase I will be treating the wastewaters from the kraft mill operation, not the bleach operation?

MR. MILLER: Only from the unbleached operation.

MR. MAURIELLO: Assume for a minute that Phase II provides an economically feasible method of producing activated carbon and that Phase I meets your requirements of what water could be reused. What percentage of the St. Regis discharge could be involved in a recycling process?

MR. MILLER: You are talking about locally here?

MR. MAURIELLO: Right.

MR. MILLER: Well, our target is 90 percent of that which emanates from the unbleached operation. Now, Medie will still have to tell me what that is overall.

What is the split--

MR. STILL: I can't tell you what the gallonage is from the bleach plant.

MR. MILLER: I don't know either.

MR. MAURIELLO: Thank you.

MR. WHITE: Mr. Crockett?

MR. CROCKETT: My question would be for Mr. Hudson.

In the slides that you showed us much earlier there was one that depicted part of your system and that also included what I took to be a nutrient feed system, it looked to be an ammonia tank or something of that order. You do use nutrients in your biological system, do you not?

MR. HUDSON: Yes, sir.

MR. CROCKETT: With ammonia and phosphorus?

MR. HUDSON: Yes, sir.

MR. CROCKETT: Do you have any idea whether or not there will be a carryover of these chemicals through the plant into Eleven Mile Creek and thence into Perdido Bay? If so, would it be in any significant quantity?

MR. HUDSON: I would prefer to have Mr. Still answer that since he is in charge of this operation.

Medie, would you answer that?

MR. STILL: Mr. Crockett, we are using minimal quantities of these nutrients to the extent that they are the amount that will be consumed, you know, by the organic waste and the microorganisms, you know, at the same time that we are consuming the waste. And so I would not expect any carryover, you know, of active nitrogen and phosphorus into the bay.

MR. CROCKETT: Thank you, Mr. Still. I quite well understand that in certain biological treatment plants for paper mill wastes that you must add nutrients in order to make the process effective, but I thought I might ask the question, since you were doing it here,if you had any idea as to the possible carryover,and thank you for your answer.

MR. HUDSON: May I add one thing, Mr. Crockett? Part of the control procedure is the dissolved oxygen, which is the oxygen content of the water, and the oxygen content of the water in the creek is much higher than it is in Perdido River.

Does that--

MR. CROCKETT: Mr. Hudson, I know that you can have a lot of oxygen or no oxygen and it wouldn't make any difference about nitrogen and phosphorus being in there. The fact that you do have it, I think that--I am not an expert in that line, but I am glad to hear that there is dissolved oxygen in Eleven Mile Creek.

MR. WHITE: Any other comments or questions?

MR. HUDSON: Mr. Chairman, since there was an interest in the 14-point program and the progress we have made, I do have copies of the progress reports and may I ask that these be included in the record?

MR. WHITE: Yes, they will be included in the record as an--let's go off the record a second.

(Off the record.)

MR. WHITE: Back on the record.

Yes, these will be accepted as a part of the official record.

(The above-mentioned reports follow:)

PAPER COMPANY Gulf Life Tower, Jacksonville, Florida 32207

January 13, 1972

Mr. John White
Director of Regulatory Programs Office
Environmental Protection Agency
Suite 300
1421 Peachtree Street, N. E.
Atlanta, Georgia 30309

Dear Mr. White:

Following is a report on progress made in water pollution abatement at the Cantonment mill of St. Regis Paper Company.

The remaining in-plant change, to install a combined condensate recovery system for reuse of the No. 2 mill evaporator condensates in the No. 2 mill causticizing area, has been completed. The program developed in March 1971 for in-plant modifications for reduction of raw waste BOD has now been fulfilled.

The improved secondary treatment system, which was placed into full operation on October 22, 1971, continues to operate satisfactorily.

Very truly yours,

H. R. Emery
Manager - Engineering Services

bb

cc: Mr. V. D. Patton

bl cc: H. Crawford
W. R. Haselton
R. T. Hudson
C. S. Johnson
J. E. Kussmann
S. K. Pratt
C. P. Sifton
R. S. Welch

December 23, 1971

Mr. John White
Director of Regulatory Programs Office
Environmental Protection Agency
Suite 300
1421 Peachtree Street, N. E.
Atlanta, Georgia 30309

Dear Mr. White:

Following is a report on progress made in water pollution abatement at the Cantonment mill of St. Regis Paper Company.

Progress was continued on the remaining inplant change, to install a combined condensate recovery system for reuse of the No. 2 mill evaporator condensates in the No. 2 mill causticizing area. This item scheduled to be completed before December 31, 1971.

The improved secondary treatment system, which was placed into full operation on October 22, 1971, continues to operate satisfactorily.

Very truly yours,

H. R. Emery
Manager-Engineering Services

/lj

cc: V. D. Patton

[illegible] PAPER COMPANY Gulf Life Tower, Jacksonville, Florida 32207

November 30, 1971

Mr. John White
Director of Regulatory Programs Office
Environmental Protection Agency
Suite 300
1421 Peachtree Street, N. E.
Atlanta, Georgia 30309

Dear Mr. White:

Following is a report on progress made in water pollution abatement at the Cantonment mill of St. Regis Paper Company.

Progress was continued on the remaining inplant change, Item 12 in the summary report of July 15, 1971, to install a combined condensate recovery system for reuse of the No. 2 mill evaporator condensates in the No. 2 mill causticizing area. This item is about 90 percent complete and is expected to be completed by December 17, 1971.

Operation of the improved secondary treatment system, which was placed into full operation on October 22, 1971, is continuing. Stabilization of the system is continuing and the system appears to be operating as required.

Very truly yours,

H R Emery
H. R. Emery
Manager - Engineering Services

HRE/ETT/bb

cc: Mr. V. D. Patton

PAPER COMPANY Gulf Life Tower, Jacksonville, Florida 32207

October 29, 1971

Mr. John White
Director of Regulatory Programs Office
Environmental Protection Agency
Suite 300
1421 Peachtree Street, N. E.
Atlanta, Georgia 30309

Dear Mr. White:

Following is a report on progress made in water pollution abatement at the Cantonment mill of St. Regis Paper Company.

Progress has continued on the fourteen inplant changes summarized in our report of July 15, 1971. Thirteen of the fourteen items have been completed. The remaining item, Item 12 in the summary, to install a combined condensate recovery system for reuse of No. 2 mill evaporator condensates in No. 2 mill causticizing area, is about 50 per cent complete and is expected to be completed about November 30, 1971. As a result of inplant modifications and operating improvements, the average daily raw waste BOD of 1970 has been reduced about one-third.

Construction of the improved secondary treatment system has been completed and the system was placed into full operation on October 22, 1971.

Nutrient feed rates are presently being established, and, of course, the system will take some time to stabilize. Early indications are such that we fully expect the system to perform as required.

Very truly yours,

H. J. Munson
Project Manager
Environmental Engineering

HJM/ETT/bb

cc: Mr. V. D. Patton

1

August 10, 1971

Mr. John White
Director of Regulatory Programs Office
Environmental Protection Agency
Suite 300
1421 Peachtree Street, N. E.
Atlanta, Georgia 30309

Dear Mr. White:

Following is a report on progress made in improving in-plant conditions at the Cantonment mill of St. Regis and on the status of the environmental study of Ferdi Bay.

Progress has continued on the three uncompleted items of the fourteen in-plant changes summarized in our report of July 15, 1971. The remaining three items a scheduled for completion on or before October 31, 1971.

The environmental study of Perdido Bay, being conducted by T. W. Beak Consult Limited of Toronto, Ontario, is scheduled for completion in October, 1971.

Because the remaining items to be reported to you are scheduled for completion or before October 31, 1971, with your permission, our next progress report will be made in October, 1971.

Very truly yours,

H. J. Munson
Project Manager
Environmental Engineering

HJM/ETT/bb

St. Regis PAPER COMPANY Gulf Life Tower, Jacksonville, Florida 32207

July 15, 1971

Mr. John White
Director of Regulatory Programs Office
Environmental Protection Agency
Suite 300
1421 Peachtree Street, N. E.
Atlanta, Georgia 30309

Dear Mr. White:

Following is a report on progress made in improving in-plant conditions at the Cantonment mill of St. Regis and on the status of the environmental study of Perdido Bay.

Progress has continued on the fourteen in-plant changes summarized in our report of June 14, 1971. Eleven of the fourteen items have been completed, and the remaining three items are scheduled for completion on or before October 31, 1971. A summary of the status of the fourteen in-plant modifications will be found in the attached Appendix A.

The environmental study of Perdido Bay, being conducted by T. W. Beak Consultants Limited of Toronto, Ontario, was continued. Beak is expected to complete his work in October, 1971.

Very truly yours,

H. J. Munson
Project Manager
Environmental Engineering

ETT/jk
Attachment
cc Mr. V. D. Patton (w/encl.)

APPENDIX A

PROGRESS REPORT

ST. REGIS PAPER COMPANY

PENSACOLA, FLORIDA

July 15, 1971

In-Plant Modifications for Reduction of Raw Waste BOD_5

Previous Items

Item 1 The underflow from the No. 2 mill turpentine recovery system will be piped to the lime mud filter rather than to the sewer. If successful, a similar project will be undertaken in the No. 1 mill.

Status: Completed.

Item 2 The No. 2 mill excess evaporator condensate well will be piped to an existing cooling tower rather than directly to the sewer.

Status: Completed.

Item 3 Replace the damper in breeching from No. 3 recovery furnace to reduce plugging and cleaning of the cyclone contact evaporator.

Status: Completed.

Item 4 The following overflow alarms will be installed:

(a) No. 2 mill turpentine condenser separator
(b) No. 2 mill weak black liquor storage tanks.
(c) No. 1 mill weak black liquor storage tanks.
(d) No. 2 mill heavy black liquor storage tanks.

These alarms will assist operating personnel in avoiding accidental spills.

Status: (a) Completed
(b) Completed
(c) Completed
(d) Completed

Item 5	A dump tank will be provided in No. 2 mill to collect washer vat dumps for recycle to the No. 1 digester blow tank.
Status:	Completed.
Item 6	A water purge will be provided for the tall oil plant piping to reduce periodic shutdown losses.
Status:	Completed.
Item 7	The overflow from No. 2 mill salt cake mixing tank will be piped to an existing holding tank, rather than to the sewer. The holding tank, recently installed for the collection of such losses, discharges to the recovery system.
Status:	Completed.
Item 8	The tall oil seal tank pump will be replaced with one of greater capacity to reduce intermittent overflows of the seal tank.
Status:	Investigation revealed that a faulty pH controller was the cause of this problem rather than lack of pump capacity. Repair of the controller has corrected pump suction conditions and overflow has been eliminated.

New Items Undertaken

Item 9	Install overflow alarms in No. 1 pulp mill as follows: (a) Hardwood stock, or broke chest (known as "diffuser chest"). (b) Decker vat. (c) Concentrated liquor storage tank. (d) Soap storage tank. (e) No. 1 mill stock chest (known as "F" chest). (f) Overflow on line from spray tower to mixing tank.
Status:	Completion scheduled for October 31, 1971.
Item 10	Pipe No. 1 mill washer vat drains to digester blow tank.
Status:	Completion scheduled September 30, 1971.

(Continued)....

Item 11	Pipe Baume' and soap sampler overflows to reclaim tank, No. 2 mill.
Status:	Completed
Item 12	Install combined condensate recovery system for reuse of No. 2 mill evaporator condensates in No. 2 mill causticizing area.
Status:	Completion scheduled for October 31, 1971.
Item 13	The overflow from No. 2 mill precipitator foam pots will be piped to an existing holding tank, rather than discharged to the sewer
Status:	Completed.
Item 14	Pipe Baume' sample pot to the soap tank, No. 1 pulp mill.
Status:	Completed

June 14, 1971

Mr. John White
Director of Regulatory Programs Office
Environmental Protection Agency
Suite 300
1421 Peachtree Street, N. E.
Atlanta, Georgia 30309

Dear Mr. White:

Following is a report on progress made in improving in-plant conditions at the Cantonment mill of St. Regis and on the status of the environmental study of Perdido Bay.

Progress has continued on the thirteen in-plant changes summarized in our report of May 14, 1971. One additional item has been added. Ten of the fourteen items have been completed, and the remaining four items are scheduled for completion on or before October 31, 1971. A summary of the status of the fourteen in-plant modifications will be found in the attached Appendix A. Other possible modifications are being investigated and it is expected that several additional projects will be developed which will reduce or eliminate existing sources of BOD_5.

The environmental study of Perdido Bay, being conducted by T. W. Beak Consultants Limited of Toronto, Ontario, was continued. The dye dispersion study and a chloride profile to determine dispersion of waters in the upper Perdido Bay and the dilution of waters in the lower Perdido Bay have been completed. Additional chloride profiling to further define dilution of waters in the lower

Perdido Bay is planned. Preparations are being made to determine, beginning June 16, 1971, the effects of dilution, salinity, and other fresh water sources on the foaming tendency and stability of St. Regis mill effluent and other sources of water to Perdido Bay.

Very truly yours,

H. J. Munson
Project Manager
Environmental Engineering

bb
Enclosure

cc: Mr. V. D. Patton w/encl.

APPENDIX A

PROGRESS REPORT

ST. REGIS PAPER COMPANY

PENSACOLA, FLORIDA

June 14, 1971

In-Plant Modifications for Reduction of Raw Waste BOD$_5$

Previous Items

Item 1 The underflow from the No. 2 mill turpentine recovery system will be piped to the lime mud filter rather than to the sewer. If successful, a similar project will be undertaken in the No. 1 mill.

Status: Completed.

Item 2 The No. 2 mill excess evaporator condensate well will be piped to an existing cooling tower rather than directly to the sewer.

Status: Completed.

Item 3 Replace the damper in breeching from No. 3 recovery furnace to reduce plugging and cleaning of the cyclone contact evaporator.

Status: Completed.

Item 4 The following overflow alarms will be installed:

(a) No. 2 mill turpentine condenser separator.
(b) No. 2 mill weak black liquor storage tanks.
(c) No. 1 mill weak black liquor storage tanks.
(d) No. 2 mill heavy black liquor storage tanks.

These alarms will assist operating personnel in avoiding accidental spills.

Status:
(a) Completed.
(b) Completed.
(c) Completed.
(d) Completed.

Item 5 A dump tank will be provided in No. 2 mill to collect washer vat dumps for recycle to the No. 1 digester blow tank.

Status: Completed.

Item 6 A water purge will be provided for the tall oil plant piping to reduce periodic shutdown losses.

Status: Completed.

Item 7 The overflow from No. 2 mill salt cake mixing tank will be piped to an existing holding tank, rather than to the sewer. The holding tank, recently installed for the collection of such losses, discharges to the recovery system.

Status: Completed.

Item 8 The tall oil seal tank pump will be replaced with one of greater capacity to reduce intermittent overflows of the seal tank.

Status: Investigation revealed that a faulty pH controller was the cause of this problem rather than lack of pump capacity. Repair of the controller has corrected pump suction conditions and overflow has been eliminated.

New Items Undertaken

Item 9 Install overflow alarms in No. 1 pulp mill as follows:

(a) Hardwood stock, or broke chest (known as "diffuser chest").
(b) Decker vat.
(c) Concentrated liquor storage tank.
(d) Soap storage tank.
(e) No. 1 mill stock chest (known as "F" chest).
(f) Overflow on line from spray tower to mixing tank.

Status: Work orders have been prepared and estimates made. Completion scheduled for October 31, 1971.

Item 10	Pipe No. 1 mill washer vat drains to digester blow tank.
Status:	Work order being estimated. Completion scheduled September 30, 1971.
Item 11	Pipe Baume' and soap sampler overflows to reclaim tank, No. 2 mill.
Status:	Completed.
Item 12	Install combined condensate recovery system for reuse of No. 2 mill evaporator condensates in No. 2 mill causticizing area.
Status:	Completion scheduled for October 31, 1971.
Item 13	The overflow from No. 2 mill precipitator foam pots will be piped to an existing holding tank, rather than discharge to the sewer.
Status:	Completed.
Item 14	Pipe Baume' sample pot to the soap tank, No. 1 pulp mill.
Status:	Work on sampler of No. 1 set is completed. Work on sampler of No. 2 set is to be completed by June 15, 1971.

May 14, 1971

Mr. John White
Director of Regulatory Programs Office
Environmental Protection Agency
Suite 300
1421 Peachtree Street, N. E.
Atlanta, Georgia 30309

Dear Mr. White:

Following is a report on progress made in improving in-plant conditions at the Cantonment mill of St. Regis and on the status of the environmental study of Perdido Bay.

Substantial progress has been made on the thirteen in-plant changes now being undertaken. Seven of the thirteen items have been completed, three items are scheduled for completion by June 1, 1971, and the remaining three items are scheduled for completion by October 31, 1971. A summary of the status of the thirteen in-plant modifications will be found in the attached Appendix A. Other possible modifications are being studied and it is expected that such studies will result in the development of several additional projects which will reduce or eliminate existing sources of BOD_5.

The services of T. W. Beak Consultants Limited of Toronto, Ontario, have been engaged to conduct an environmental study of Perdido Bay. Current studies, using the Rhodamine dye dispersion and salinity profile technique, have been conducted to determine the flow pattern of waters in Perdido Bay and its tributaries.

Data developed in the current studies are now being evaluated. Preparations are being made to begin a sampling and testing program, based on results of the current studies, to evaluate the foaming stability and foaming tendency of waters in Perdido Bay. This phase of the study will also include investigation of sources of foaming constituents. The Company again invites representatives of the Environmental Protection Agency to consult with Beak technicians during the course of the studies and become familiar with the details of the work being undertaken.

Very truly yours,

H. J. Munson
Project Manager
Environmental Engineering

bb
Enclosure

cc: Mr. W. D. Patton w/encl.

APPENDIX A

PROGRESS REPORT

ST. REGIS PAPER COMPANY

PENSACOLA, FLORIDA

May 14, 1971

In-Plant Modifications for Reduction of Raw Waste BOD_5

Previous Items

Item 1 The underflow from the No. 2 mill turpentine recovery system will be piped to the lime mud filter rather than to the sewer. If successful, a similar project will be undertaken in the No. 1 mill.

Status: About 95 per cent of the piping has been completed. Delivery of the required instrumentation is expected by May 14. Completion of the job is scheduled by June 1, 1971.

Item 2 The No. 2 mill excess evaporator condensate well will be piped to an existing cooling tower rather than directly to the sewer.

Status: Completed.

Item 3 Replace the damper in breeching from No. 3 recovery furnace to reduce plugging and cleaning of the cyclone contact evaporator.

Status: Completed.

Item 4 The following overflow alarms will be installed:

(a) No. 2 mill turpentine condenser separator.
(b) No. 2 mill weak black liquor storage tanks.
(c) No. 1 mill weak black liquor storage tanks.
(d) No. 2 mill heavy black liquor storage tanks.

These alarms will assist operating personnel in avoiding accidental spills.

Status:
(a) Completed.
(b) Completed.
(c) Completed.
(d) The alarms have been delivered and installation will be completed by June 1, 1971.

Item 5 — A dump tank will be provided in No. 3 mill to collect washer room floor for recycle to the No. 1 digester blow tank.

Status: The tank has been installed. Piping is to be completed by May 20, 1971.

Item 6 — A water purge will be provided for the tall oil plant piping to reduce periodic shutdown losses.

Status: Completed.

Item 7 — The overflow from No. 2 mill salt cake mixing tank will be piped to an existing holding tank, rather than to the sewer. The holding tank, recently installed for the collection of such losses, discharges to the recovery system.

Status: Completed.

Item 8 — The tall oil seal tank pump will be replaced with one of greater capacity to reduce intermittent overflows of the seal tank.

Status: Investigation revealed that a faulty pH controller was the cause of this problem rather than lack of pump capacity. Repair of the controller has corrected pump suction conditions and overflow has been eliminated.

New Items Undertaken

Item 9 — Install overflow alarms in No. 1 pulp mill as follows:

(a) Hardwood stock, or broke chest (known as "diffuser chest").
(b) Decker vat.
(c) Concentrated liquor storage tank.
(d) Soap storage tank.
(e) No. 1 mill stock chest (known as "F" chest).
(f) Overflow on line from spray tower to mixing tank.

Status:	Work orders have been prepared and estimates made. Completion scheduled for October 31, 1971.
Item 10	Pipe No. 1 mill washer vat drains to digester blow tank.
Status:	Work order being estimated. Completion scheduled September 30, 1971.
Item 11	Pipe Baume' and soap sampler overflows to reclaim tank, No. 2 mill.
Status:	Completed.
Item 12	Install combined condensate recovery system for reuse of No. 2 mill evaporator condensates in No. 2 mill causticizing area.
Status:	Completion scheduled for October 31, 1971.
Item 13	The overflow from No. 2 mill precipitator foam pots will be piped to an existing holding tank, rather than discharge to the sewer.
Status:	Completed.

April 27, 1971

Mr. John White
Director of Regulatory Programs Office
Environmental Protection Agency
Suite 300
1421 Peachtree Street, N. E.
Atlanta, Georgia 30309

Dear Mr. White:

Pursuant to the commitment made in the meeting held in your office on March 12, 1971, we enclose a report on progress made in improving in-plant conditions, on the status of the proposed study of Perdido Bay, and on the possible modifications to the secondary wastewater treatment facilities at the Cantonment mill of St. Regis. In addition, the Company presents herein an evaluation of its maximum capabilities toward improving the characteristics of the effluent from its Cantonment mill.

After a careful assessment of the Company's capability to reduce in-plant raw waste load, it is now clear that the raw waste BOD_5 load cannot be reduced from the 73,500 lbs. daily average of 1970 to 51,000 lbs. per day. However, the Company believes that with maximum effort, the raw waste load can be reduced to 63,500 lbs. per day by October 31, 1971. Substantial progress in this direction has been made already. It should be noted that of the thirteen in-plant changes now being undertaken, nine will be completed prior to June 1, 1971.

The Company estimates that the completion of the thirteen in-plant modifications on which progress is reported will result in a reduction in raw waste BOD_5 load of 7,500 pounds per day.

These projects are the result of a careful review of all sources of raw waste BOD_5. Other possible means to bring about further reductions are being carefully studied, and it is expected that such studies will result in the development of several additional purposeful projects which will make it possible to reduce the total raw waste load level to the 63,500 level. This figure represents the maximum reduction which can be obtained. The Company, nevertheless, intends to explore on a continuing basis possible means of accomplishing further reductions.

Based on the foregoing program, the Company will be able to limit its treated effluent to a monthly average level not in excess of 6,350 lbs. of BOD_5 per day after October 31, 1971. This represents a full 90% reduction of the raw waste BOD_5, as required by the State of Florida.

The Company is aware, of course, that its previous commitments to Florida must be met.

The Company, as stated in the enclosed report, has studied the possibility of increasing the degree of secondary treatment being provided. It has been determined that the facilities now under construction have been designed to provide the maximum useful horsepower in aeration and with a nutrient system of ample capacity. On its own initiative, the Company, prior to the 1971 Perdido Bay Conference, added 300 h. p. in aeration capacity to the system, bringing the total horsepower to 1500. This is the maximum that can be used in the detention time provided. Detention time has been increased to six days, which represents the limit of land availability.

With regard to foam, it has been pointed out that the ratio in which various foaming constituents appear in mill effluent differs widely from the ratios in which such constituents occur at various points in Perdido Bay and Big Lagoon. This strongly indicates the possibility of other sources of such constituents. It is for the purpose of determining the true cause or causes of foam that the Company has engaged the services of T. W. Beak Consultants, Ltd. of Toronto. The Company invites representatives of the Environmental Protection Agency to consult with Beak technicians during the course of the studies and become familiar with the details of the work being undertaken.

The following positive steps are being taken to reduce foaming constituents in mill effluent:

1. Items 1, 4a, 4b, 4c, 5, 6, 8, 9c and 9D of the enclosed report will not only reduce raw waste BOD_5, but will eliminate the discharge of wastewater disproportionately high in foaming constituents.

2. The secondary treatment system now under construction will reduce further the concentration of foaming constituents. Such constituents respond favorably to efficient biological treatment.

The relationship between the concentration of foaming constituents and the generation of foam is not linear. With 90% secondary treatment facilities operational as of October 31, 1971, the Company expects the concentration of foaming constituents will be reduced to a level below that necessary to form stable foam in Perdido Bay, if studies being undertaken should reveal that the Cantonment mill is primarily responsible for foam generation in the Bay.

During the meeting at Atlanta on March 12, 1971, it appeared that there might be some misconception as to the function of the Company's tall oil recovery system. This system produces approximately 27 tons per day of crude tall oil which is a valuable by-product; however, the tall oil recovery system is in no way related to water pollution. The process, as related to pulp mill operation, begins with the decanting of "soaps" which rise to the top of spent cooking chemical storage tanks. These soaps are skimmed from the tanks and processed in the tall oil plant. Prior to the development of tall oil markets, these soaps were burned as fuel in the pulp mill chemical recovery boilers. Soap not recovered by skimming is burned as fuel, as there is no alternate method of disposal.

The efficiency of the tall oil plant is related only to the economics of production of a valuable by-product as opposed to using its raw material for fuel. The process lends itself only to these alternatives. The alternative of wasting this material to the mill effluent is not available. Actually, the efficiency of the Pensacola tall oil recovery system is quite high and consistently exceeds averages for the industry as reported by its Pulp Chemical Association.

To meet the treatment levels and the time schedule proposed herein will require concerted effort on the part of the Company. The Company believes, however, that these conditions can be met.

The Company is pursuing diligently its research work to develop a system of water reclamation and reuse based on activated carbon treatment. This research work being conducted at the Cantonment mill is on schedule with the Water Quality Office of the Environmental Protection Agency. The $2,500,000 project is financed partially by a government grant of $878,000, the remainder of which is to be provided by the Company. The Company hopes that this work will result in a major advance in wastewater treatment.

In conclusion, the Company wishes to call the following to the attention of the Conferees:

1. The Company has undertaken a program designed to reach an effluent BOD$_5$ level of 6,350 lbs. per day by October 31, 1971, as well as the 90% treatment level required by the State of Florida.

2. The 63,500 lb. level is the lowest possible in-plant BOD$_5$ reduction the Company can reach and maintain.

3. Finally, the Company believes there would be no noticeable difference in water quality in Perdido Bay between a daily BOD$_5$ discharge of 6,350, which the Company can achieve, and a daily BOD$_5$ discharge of 5,100 pounds per day, which the Company cannot achieve.

By reaching a BOD$_5$ discharge level of 6,350 pounds per day, the following improvements in water quality should occur:

1. Odor resulting from anaerobic conditions in the waters of Elevenmile Creek will be eliminated.

2. Foaming constituents generated by the Company's pulping processes should be reduced beyond their capacity to generate stable foam in Perdido Bay.

3. Elevenmile Creek will be in compliance with the applicable water quality standards of the State of Florida.

4. The dissolved oxygen level of Perdido Bay, beyond the mixing zone, will be well within the established water quality standards.

In summary, the Company assures the Conferees most emphatically that its commitments herein represent a maximum effort to reduce waste discharges into the receiving waters to the lowest possible level in the quickest possible time; i. e., 6,350 pounds of BOD per day by October 31, 1971. Moreover, the Company submits that modifications to the recommendations adopted by the Conferees in February of 1971, in accordance with the Company's maximum effort as stated, will result in essentially the same water quality intended by the Conferees.

Very truly yours,

H. J. Munson
Project Manager
Environmental Engineering

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MR. WHITE: Mr. Levin, do you have any comments or questions?

MR. LEVIN: Yes.

Mr. Hudson, you said before the break, the lunch break, that you had some letters. Did you get hold of those?

MR. HUDSON: I do not have them. I have a copy of one of them, and I am really quite reluctant to enter them into the record without getting permission of the author.

However, this one was addressed to us with no restrictions on it and I would not mind--I would not be reluctant to enter this one if you will accept this.

MR. WHITE: That is your decision. Please identify it and read it, if you would, and that will constitute its entry into the record.

MR. HUDSON: All right.

This was written to one of our employees and was given to me. Written by Mr. Clinton J. Chew:

> I am a resident of Escambia County and I have lived for the last 22 years on the south side of Perdido Bay just opposite to where the Eleven Mile Creek enters the bay.
>
> For many years my family and myself enjoyed the beauty of the bay and everything that

goes along with owning waterfront property, such as swimming, fishing, boating, and waterskiing. Then we started to notice that the bay was beginning to deteriorate. The fish were getting scarce and directly in back of my house the bottom of the little cove was literally ankle deep with stinking muck and rotting wood chips or bark. It was just so bad that the 22-foot cruiser sitting in the boathouse has been used only twice in the last three years. As a matter of fact, it wasn't even registered in 1971.

Recently we have noticed a decided difference in Perdido Bay. The beaches are much cleaner and the bottom seems to be cleaner than it has been for many years.

I would like to take this opportunity to say thanks to our good neighbor, St. Regis Paper Company, for a job well done. I'm sure with your new facility that has been in operation just a short while, Perdido Bay will soon return to its natural habitat.

MR. WHITE: Any comments or questions? If not, thank you very much, Mr. Hudson.

MR. HUDSON: All right.

MR. WHITE: And I believe we will take a 15-minute recess before hearing from the rest of the speakers.

(RECESS)

MR. WHITE: Let's go back in session.

If you would, Mr. Mauriello, proceed.

MR. MAURIELLO: Mr. Hudson, did you wish to make an addition to your comments?

MR. HUDSON: Yes, I would like to make one further comment.

I misunderstood the question, I believe Mr. Crockett asked or Mr. Traina, about the in-plant survey. I have had an opportunity to look at the report of Container Corporation at Brewton. We have no objection whatsoever to the same sort of report and in-plant investigation that the Container Corporation had.

MR. WHITE: Thank you.

MR. HUDSON: We would be very glad to have it.

MR. TRAINA: We will be in touch with you directly on that. Mr. Adams will be in touch with you.

MR. HUDSON: We will be very glad to cooperate.

MR. WHITE: Mr. Mauriello.

MR. MAURIELLO: I have Mr. Clinton Bell, President of

Local 447, the St. Regis employees.

Is Mr. Bell still here?

MR. BELL: Yes, sir.

CLINTON G. BELL

PRESIDENT, LOCAL 447

INTERNATIONAL BROTHERHOOD OF PULP,

SULPHITE & PAPER MILL WORKERS

ST. REGIS PAPER COMPANY

MR. BELL: Mr. Chairman, gentlemen.

I am Clinton Bell. I am from Flomaton, Alabama, president of Local 447 of the International Brotherhood of Pulp, Sulphite & Paper Mill Workers. I am also Chairman of the Joint Locals at the St. Regis location at Cantonment.

At that location we have six local unions and four international unions. I have some of the people here with me that are presidents of those local unions and we would like to say something in behalf of these people who work and make their living at that plant.

But before I start I would like to start by introducing Oscar Mosley, the president of Local 561 of the International Brotherhood of United Paper Makers and Paper Workers.

Brother Smoky Perkins, president of Local 1937 of the International Brotherhood of Electrical Workers.

Brother Walter Rodak, president of 875 of the International Association of Machinists.

Brother John Herndon, president of Local 737, International Brotherhood of Pulp, Sulphite & Paper Mill Workers.

Mr. Chairman, there are approximately 2,000 men and women who work at the St. Regis plant. The payrolls of these workers support them and their families, which involves approximately 10,000 men, women and children. There are at least 1,000 other people who do not work directly for the company but whose livelihood depends on the company.

The company spends more than $1 million every week in this area for its operations, including payroll, and people who are affected economically run into the tens of thousands. Most of these people live in Florida, but a large number of these people live in Alabama, including me and my family.

Gentlemen, I don't know of a single one of these people that I have introduced who is not against pollution and who does not want the company to solve its pollution problems. At the same time, we as workers are beginning to wake up to the stake we have in this pollution control. There could be a lot of jobs riding on the decisions you make. I can tell you that it is not a pleasant thing to see a 50-year-old man lose his job of a lifetime when his chances of getting an equally good job somewhere else are not good.

We want you to understand that we are not coming in here trying to defend pollution. What we are saying is this. We believe the pollution problems can be solved without putting working people out on the streets. We believe that you can go about business and try and clean up pollution in a reasonable way that does not threaten people's security.

Last year you came in here with an order for the company to reduce pollution or reduce production in three months time. The company doubted it could be done. I have worked for St. Regis for 17 years in the technical department and when I heard what happened I didn't think it could be done either and I expect there was some doubt in your minds too.

You should know that our unions met with the company officials at our request and we all agreed to do the best we could, and as you know, the order was met. Personally, I think we were very fortunate for it to turn out like it did. Suppose the company couldn't have met the order? I don't know what would have happened, but I am afraid some of us would have been out on the streets today.

The point I am trying to make to you is this. An industry can't survive if it is continually harassed. The company can't survive for long if it is forced to spend a lot of money every year that it can't plan on. That is the kind of thing that brings about sudden change or even shutdowns and puts people out of work unnecessarily.

I might tell you that three St. Regis mills in other parts of the country have already discontinued operations because of strict requirements that they couldn't meet and the fourth mill will close later this year. Just about every day you pick up the paper and see where an industry has been forced to close up.

The point I am making to you is this. You people in government owe the working people the consideration not to act hastily. We know pollution control is necessary and must come, but we expect you to act wisely and do everything in your power to bring about progress before you put our jobs on the line.

We expect you to make reasonable decisions that a company can meet instead of acting on the strength of a lot of wild charges and accusations by people who don't know both sides of the situation. We want you to know there is more at stake than seeing someone who comes here demanding a stop to pollution immediately. That can't be done and we all know it.

I want to say to you again that we don't defend pollution. The working people at St. Regis live here and we all want clean water just as much as anybody else. But we know it takes time to do the job and we are looking for you to use reason and good judgment as you work for pollution control. If you do that, you will find that the working people will support you and so will the company.

As to the business before this conference at this time, we want you to know that we have worked to do our part toward pollution control at the St. Regis plant and we believe the company has done a good job in improving the water treatment. I can tell you from personal knowledge that there has been a big improvement in the quality of Eleven Mile Creek and upper Perdido Bay since October. I understand that further improvements will be made by the company as technology develops to make these improvements.

This is the way it should be done. The problem can be solved to everybody's satisfaction without putting people out of work if we go about our tasks in a calm and responsible way.

We are opposed to any hasty action by anyone that would threaten the livelihoods of our people. We want you to know our views and give us the consideration we request.

Thank you.

MR. WHITE: Thank you, Mr. Bell. And let me hasten to assure you that it is certainly not the desire of myself, nor, I am sure, any of the other conferees, to put anyone out of work in this. I think you made a good statement with several good points in it.

Also I think probably the employees should be commended somewhat too because I feel that it took a total all-out effort to meet the raw waste load figure which was imposed at the last conference.

MR. BELL: It certainly has. It took effort on everybody's part.

MR. WHITE: Are there comments or questions?

Thank you.

MR. BELL: Thank you.

MR. MAURIELLO: The next speaker, Mrs. Allen, do you wish to make a presentation?

MRS. JO ANN ALLEN
STAR ROUTE, BOX 605
LILLIAN, ALABAMA

MRS. ALLEN: I am Jo Ann Allen, Star Route, Box 605, Lillian Alabama.

I am here with an unprepared statement. I respectfully ask that I may have a final statement placed in the record of this hearing.

MR. WHITE: Do you need 15 days?

MRS. ALLEN: I will take as many as you give me or less.

MR. WHITE: I believe we gave the company 15 days before.

MRS. ALLEN: That will be fine.

MR. WHITE: If that will be fine, we will leave it open 15 days.

MRS. ALLEN: I would like to say I speak as a lay citizen, for all you scientists and experts, and after having heard Mr. Corwin's letter read this morning I assume I should say I am a representative of the Perdido River Basin Antipollution Association, so I will be representing that association.

I first would like to have placed in the record my most recent pollution evidence concerning Perdido Bay.

On January 10, 1972, 7:50 a.m., on the Scott Allen beach on Soldier Creek.

On January 23, 1972, 9:45 a.m., Soldier Creek at the entrance of Perdido Bay. I would like to say that was in the form of floating island and in recent weeks I have seen our creek look like a bowl of floating island, if any of you all are familiar with that dessert.

My next picture of pollution evidence is north of the bridge at Eleven Mile Creek intersection on State Road 186, also called King Field Road, taken January 23, 1972, 12 p.m.

My next picture is south of the bridge at the Eleven Mile Creek intersection on State Road 186, also called King Field Road, taken January 23, 1972, 12 p.m. or 12:02.

MR. WHITE: Mrs. Allen, just so I can keep straight on things, now, you have a series of pictures that--

MRS. ALLEN: I am only going to give you these and if you would like more I will give you more. I did prepare this for you.

MR. WHITE: If you leave these for us, again like we have done in other situations, we will make them an appendix to our official transcript. They won't be reproduced in the transcript of this conference.

MRS. ALLEN: You have done that in the past, but that is all right.

MR. WHITE: Well, if you feel--how many do you have?

MRS. ALLEN: Just four.

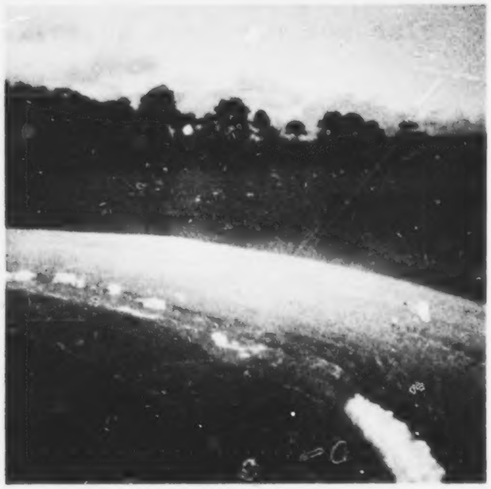
MR. WHITE: All right, if they are black and white--

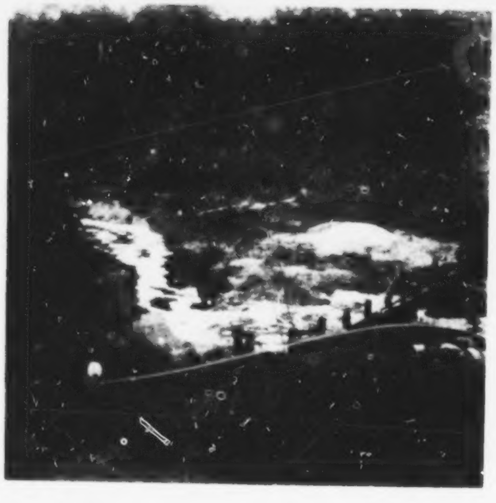
MRS. ALLEN: They are black and white.

MR. WHITE: --and if you can make available to us what we need to get them printed, we will do it.

MRS. ALLEN: I will be glad to furnish you anything else you may need that I may have.

(The above-mentioned photographs follow:)





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MR. WHITE: All right.

MRS. ALLEN: I will try not to be too repetitious. I am here as a shocked citizen. It has been a little hard to sit in on this conference and listen to what I have had to listen to today. I am disgusted.

I think lip service action and time is over. I realize this is my third such conference. I feel that some people in this room are acting or speaking as if we were back at the first conference.

I would like to say that it is not my intention or my association's intention to shut down any industry, but it is our intention to halt such as the evidence which I have just had placed into the record of this hearing which I witnessed at King Field Road on January 23. That is our intention.

I would like to ask when was the wagon wheel--Mr. Hudson may have answered this question, but I would like to ask when was the wagon wheel put on your riffle terrace, that thing that goes around, on State Road 186?

Mr. Chairman, can you answer that?

MR. WHITE: Mrs. Allen--

MRS. ALLEN: Could I ask you that question? Do you know?

MR. WHITE: Would you repeat your question and direct it to me, please.

MRS. ALLEN: Mr. Chairman, could you please tell me when the wagon wheel was placed on the riffle terrace of St. Regis Paper Company right north of the bridge on Highway 186 off King Field Road?

MR. WHITE: Mr. Mauriello, can you answer that?

MR. MAURIELLO: No, sir. I think Mr. Hudson mentioned that, though, that that installation was just completed two or three days ago.

Am I correct, Mr. Hudson, the one you showed the picture?

MR. HUDSON: The first of January as far as I recall. January 4, excuse me.

MR. WHITE: Well, that is adequate. Let the record show that Mr. Hudson responded January 4.

MRS. ALLEN: I am sorry, Mr. Mauriello, if I--excuse me.

MR. WHITE: If you will, just don't direct questions to the audience. If you will direct them to us, we will attempt to get them answered.

MRS. ALLEN: I am sorry.

MR. WHITE: Just a small point of order.

MRS. ALLEN: I will try to keep my cool. It is a little hard at this stage of the game.

And before I finish, Mr. Chairman, I will be calling on someone to back me up on my pollution evidence, if I may.

I would like to ask that if there is no possibility of ceasing all this pollution coming out of that riffle terrace in the immediate future that immediate action be taken to have the dike raised. On January 23, 1972, at noon, the water was just about three inches below that dike and I feel that in case of any kind of a rain, it wouldn't necessarily have to be a heavy rain, that we might experience water coming over the whole dike.

I would also like to go on record at this time as having stated I personally have seen no improvement in the condition of the waters of Perdido Bay since the last conference.

I am very concerned that the bleach plant, if I am correct, is not being considered in any waste treatment.

Am I correct on that, Mr. Chairman?

MR. WHITE: Mr. Mauriello, can you answer this for us, please?

MR. MAURIELLO: This was a question that I think we tried to explore, Mrs. Allen, and I gather that the research and development program only concerns itself with the kraft mill production and not the bleach plant waste due to the fact that the bleach plant waste cannot be used in the recycling process because of safety features if it is recycled. I believe this is the reason for it.

MR. WHITE: May we go off the record just a minute.

(Off the record.)

MR. WHITE: Let's go back on the record, please.

MR. MAURIELLO: Mrs. Allen, let me clarify something. Maybe I didn't understand your question.

Are you concerned with the treatment of the bleach plant wastes now or during the R and D project, the research and development project? There are two phases to this thing.

MRS. ALLEN: I am concerned about any wastes that might be leaving the St. Regis Paper Company, whether it be in Eleven Mile Creek or in any pipe or anywhere, from this day forward and from about six years ago.

MR. MAURIELLO: Their bleach plant waste is being treated right now through the treating system.

MRS. ALLEN: Does it meet the State of Florida standards, then, and the EPA standards?

MR. MAURIELLO: Yes, ma'am.

MR. WHITE: I might interject, as we have pointed out and the testimony was developed earlier, as far as the recommendation for BOD, 5-day BOD reduction, the company is in compliance. It was admitted that additional work had to be done under other conditions, possibly, and in a little more detail, and this in fact will be scheduled.

MRS. ALLEN: All right, sir. Thank you.

I would like to refer to page 5 of the first proceedings of the January 1970 Federal Water Pollution Control Administration's report which was given out at the first conference.

Page 5, under Recommendation B, Number 3--well, excuse me, we will go back to 2.

> The St. Regis Paper Company remove the foam-causing constituents from its effluent.

This was in January 1970, gentlemen.

> No. 3. The St. Regis Paper Company reduce the color of its waste discharge to levels not greater than background measured at the U. S. 90 Bridge on the Styx and Perdido River

My question, is it a typographical error that the Styx River is in there?

MR. WHITE: Just a minute.

MR. TRAINA: I had the wrong report, Mrs. Allen.

MR. WHITE: Just a minute, Mrs. Allen, if we may go off the record.

(Off the record.)

MR. WHITE: Let's go back on the record.

MR. TRAINA: Repeat the question, Mrs. Allen, please.

MRS. ALLEN: Item No. 3, I would like to know why the Styx River is listed there.

MR. TRAINA: I believe we considered that as a control point. In other words, we considered that as a control point for the purposes of measuring background. O. K.?

MRS. ALLEN: Yes, sir. I am sorry to have to--I have so many notes here--

MR. TRAINA: That is quite all right.

MRS. ALLEN: --it is a little hard and at this point I am not apologetic.

I would like to comment about the company's Canadian firm, Beak I believe the name was. I think it is very regrettable for any industry who has knowledge which would be so helpful, we would hope, and has put the money out to try and help us, I would hope, solve the pollution problem, to not release quite a bit of this information to the governmental agencies. I would like very much if this could be done.

I have got another page on St. Regis somewhere.

I would like to refer to page 240 of the EPA report February 24-26, 1971.

MR. TRAINA: Let's compare reports, Mrs. Allen, so I know where you are. Is this the one?

MRS. ALLEN: I think there are only three out. Yes, it is the yellow one.

MR. TRAINA: Page 240?

MRS. ALLEN: Yes, sir.

Item under B, Recommendation B, Item No. 2:

> The St. Regis Paper Company shall by June 1, 1971, materially remove the foam-causing constituents from its waste discharge such that unaesthetic foaming in Perdido Bay is eliminated. The company shall report to the conferees monthly beginning April 1, 1971, on the methods being utilized to accomplish this objective.

I would like to ask EPA if they have been receiving these monthly reports?

MR. WHITE: Yes, Mrs. Allen, I believe that these in part were encompassed and for the most part were encompassed in this 14-point program that was developed and reports have been received on it. Now, in addition to that, the biological treatment plant that the company has installed also will affect further foaming--well, how shall I put it?--foam--

MR. TRAINA: Causing?

MR. WHITE: --causing constituents. This will need to be evaluated. We can only speculate what the reduction is at this point.

MRS. ALLEN: Thank you.

I would like to know has St. Regis Paper Company completed or filed their application to the Corps of Engineers for their permit to dump as stated on page 56 of the EPA 1971 report?

MR. WHITE: I can answer your question with respect to that. The application has been filed with the Corps of Engineers. The Environmental Protection Agency has received a copy of the report or the application.

MRS. ALLEN: Well, if I am not mistaken, something came up a few minutes ago when one of the conferees was asking St. Regis, one of the officials, concerning the figures, as Mr. Levin says, that TOC, the BOD and whatever else they can come up with, concerning the water before it goes into the plant. Am I correct in feeling that this is a requirement of that permit request?

MR. WHITE: This is a requirement of the permit, and I don't have those figures at hand. We have some figures relating, I believe, to the discharge, but not with respect to the influent, not at this time. But that, of course, is available to us and we will look into that.

MRS. ALLEN: Thank you.

I am almost through with St. Regis for the moment.

I will not try and get into individuals, but I would like to say I was a fisherman, I am a native of the Perdido Bay area, I live on Soldier Creek, I have personally been damaged, my family has been damaged. I will not eat anything out of Perdido Bay; I have not for about three years. I feel no consideration was given concerning my position. I feel no consideration has been given to the many seafood men who have had to leave the area. And I am very concerned because of my food budget, which I can now no longer serve seafood two or three times a week, which I normally did. I have been damaged.

I am not quite through, after all, on St. Regis.

I would like to know does the Florida Air & Water Pollution Control run any tests at St. Regis Paper Company or are they relying on all reports that are testings that are done by St. Regis Paper Company themselves?

MR. WHITE: I call on Mr. Mauriello.

MR. MAURIELLO: The answer to your question, Mrs. Allen, is that the department does run its own tests. We take our own samples, we do split these samples, run our own analyses and compare them against the analyses run by St. Regis

Paper Company or any other industry.

MRS. ALLEN: Thank you, sir.

If I am correct, Mr. Adams felt no foaming into the bay would be noticed for some time,difference in the foaming in the bay. I would like to know from the Florida Air & Water Pollution Control or EPA how long will it take, since this new Phase I or whatever it is that went into operation on the 22nd of October, for us to notice a difference in the foam at the Eleven Mile Creek Bridge on Highway 186?

MR. WHITE: I call on Mr. Traina to respond.

MR. TRAINA: I don't know, Mrs. Allen. Indications were when we were here last year that the treatment facility which is now in operation would immediately reduce the foam-causing constituents in the Eleven Mile Creek. The presumption was that foaming in the bay would therefore be reduced. I haven't confirmed that one way or the other.

MR. MAURIELLO: I would like to make just a comment.

MR. WHITE: Mr. Mauriello.

MR. MAURIELLO: I think Mr. Crockett touched on this in the same conversation when the question came up before. This is a biological treatment process. We all know, I think that we know, that it does take a period of time for the full effectiveness of a biological process to really be seen. The estimated amount of time that this takes can be anywhere from three months to six months. I think you used some of these figures. Maybe Mr. Crockett might want to comment on this.

But it is development of a biological process and I think we have used or have used here a date of mid-October as the process officially starting or this being the date when we might say the starting date, so we could say anywheres from three to six months, I would say.

MRS. ALLEN: Well, you know, Mr. Mauriello, as a lay citizen, I just don't understand that when at the riffle terrace right at the end of their settling ponds I don't see any change, and of course I am just a lay person, but I would think that would be the first place we would see the change.

MR.TRAINA: Mrs. Allen, we have had a long experience with this. We have been down here, we have looked at the various acids and all the other constituents that comprise foam. We looked at this prior to the company installing these 14 items which we have reference to and plus looking at them prior to the installation of its treating plant. It would appear to me, based on my best technical knowledge of this kind of process and the problems of foaming, that these two actions on the part of the company should have materially reduced the foam-causing constituents at least from the plant. As I say, we have not confirmed this. It is difficult and we went through this in the last session regarding the measurements of these various acids.

However, we have now committed ourselves to go back into the plant. You heard Mr. Hudson indicate that he wants us back in there and I guess we would have gone in there, I guess, besides that point. But anyway, we are going back in, we are going to do a complete evaluation of the treatment system. Part of that evaluation will be looking at the foam-causing constituents, the same ones that we looked at the last time, and at this point that is all I can tell you.

MRS. ALLEN: Thank you, sir.

I guess I will stick to the Florida side of Perdido Bay and I would like to comment on Bayou Marcus Creek. As you gentlemen know, I am concerned with the pollution from all sources, not just one industry. I feel that the discussion about the waste facilities going into Bayou Marcus Creek have been so-called glossed over today. I am very concerned about these waste facilities that are located in that end of Escambia County. It is a growing area. I think we need an immediate assistance from someone to help somehow do something about these waste facilities in that area. I think there were six areas that dumped into Bayou Marcus Creek, and as of November 21, 1968, Pensacola News and Journal release which listed the gallons per day of waste being dumped by these subdivisions, I question the increase in this waste load since 1968. I would, as a lay citizen, like to recommend that no more tie-ins be allowed on any of those systems until they have met the 90 percent, or whatever it is, removal or come up to the Florida standards. And frankly, I do not understand why they have not taken action, the Florida Air & Water Pollution Control, on these subdivisions.

MR. TRAINA: I will just make one comment there. We did go into this, I thought, at some length this morning.

But to answer your specific question, I think the State should respond to that.

MR. MAURIELLO: Mrs. Allen, I think the comment that I would make, and maybe Mr. Levin would like to comment on this, I think we share in your concern on this. One of the things, whether it is realized here and really wasn't brought out, all of the facilities that are located on Marcus Creek are now under the permits which say there will be no more connections to the system until, and this is something that we have no control over until the litigation is over with and we can get a governmental body to move and be pushed into a direction of regionalization of that area. There is an action under way, as we understand it. We know that the county and the city have both accepted the master plan which says that there will be an elimination of these plants. Mr. Spriggs brought out the fact this morning that two of the plants are being considered to be eliminated.

I think that what I am trying to say is that we appreciate what you are saying and we are doing everything in our power right now by no more connections to the systems, but we are on hold because of the litigation and the State constitutionality of the local act which will provide a governmental body which can solve the problem.

Now, insofar as upgrading the plants, you heard a discussion, I believe, that we are pursuing even on the basis that there may become regionalization and upgrading of those existing plants to meet the 90 percent treatment in the State requirements.

MRS. ALLEN: I believe these were listed, Mr. Mauriello, back in the proceedings of the 1970 conference. If the plans still aren't in on some of these--

MR. MAURIELLO: Mrs. Allen, I would like to comment on this point. Back in 1970 the Department of Pollution Control did not have the permit system, it did not have the full responsibility of domestic wastes.

MRS. ALLEN: May I ask, did it have a Health

Department in Escambia County?

MR. MAURIELLO: I can't--there was a Health Department in Escambia County, yes, ma'am.

MR. WHITE: If I might interject something.

I think, as Mr. Traina indicated, this is something that we explored in a little detail earlier and we have got to discuss this and come to grips with this particular problem.

MRS. ALLEN: I would appreciate,because I am very concerned over it.

MR. WHITE: We share your concern.

MRS. ALLEN: And I would like to ask one more question concerning sewerages.

MR. WHITE: Sure.

MRS. ALLEN: I would like to ask Mr. Mauriello, what is the status of the Perdido Bay Manor at Lillian Bridge?

MR. MAURIELLO: Perdido Bay Country Club?

MRS. ALLEN: Perdido Bay Manor.

MR. MAURIELLO: I can't answer that. I would like to ask our regional engineer if he has some information that I am not aware of.

Mr. Doherty, do you know?

MR. WHITE: Mr. Doherty, would you come up, please?

MR. DOHERTY: Could I ask--

MR. WHITE: Would you like the question restated?

MR. DOHERTY: I would like the question rephrased, if you would, please.

MRS. ALLEN: I would like to know the status of the sewerage facilities at Perdido Bay Manor located at Lillian Bridge on the Florida side.

MR. DOHERTY: I can't answer that question. I may have the records in the office. As you realize, there are some 90-some-odd facilities--

MRS. ALLEN: Yes, sir, I can understand that.

MR. DOHERTY: --so I don't know as I can answer specifically.

MR. WHITE: Apparently that is not available at the fingertips now.

MRS. ALLEN: Yes, sir, that is understandable.

MR. WHITE: I am sure that these gentlemen would be happy to make that available to you, Mrs. Allen.

MR. DOHERTY: I can say this, all plants have filed or must have filed for a permit. We must have them at the office. This particular one I don't recall. It is a small file.

MR. WHITE: Thank you.

MRS. ALLEN: Thank you very much.

I also would like to ask someone, Mr. Chairman, from Escambia County if they can please tell me if Escambia County is still allowing the sewerage waste from the septic tanks that are being cleaned in Escambia County to be placed at the Escambia County dump on Eleven Mile Creek.

MR. WHITE: Mr. Mauriello, can you address this problem or question?

MR. MAURIELLO: I can only go back and answer it the action that we took as a result of last year's conference, which was to eliminate this. Maybe again I would have to call on Mr. Doherty for help. I do not know the answer.

MR. WHITE: Could I get--this is, of course, of interest to us, too, but could we get Mr. Doherty to give you and the conferees a report on this?

MRS. ALLEN: I would appreciate it.

MR. WHITE: Come forward to the podium, if you will, Mr. Doherty.

MR. DOHERTY: I am sorry, I forgot, I was making a note on the other and I missed the question.

MR. MAURIELLO: The question was concerned with the septic tank dumping at the county dump. Has this problem been eliminated or is there any status of it that you know of that is changed?

MR. DOHERTY: The present situation, as I understand it, the county dump is an approved area for dumping of septic tank wastes and the solid wastes from the Main Street sewage treatment plant. This has been the approved area.

Now, as you know, the Main Street sewerage treatment plant, city of Pensacola, does not vacuum filter or treat their septic tank--not the septic tank--the digester dischargers, but they are hauled to the county dump and this has been the county and the Board of Health has approved this as a dumping site.

From the water quality point of view, we have run analysis in the peripheral area of this dump and we have found to this date no signs of contamination to the receiving streams. We have used this as a control point. But this is being done.

MR. WHITE: Thank you. That is good information, Mr. Doherty.

And Mrs. Allen, I will pledge to you that we will attempt to make a check of this and get more detailed information concerning any adverse effects that might be resulting from this dump.

MRS. ALLEN: Thank you, sir.

I would also like to ask about, I believe in the recommendations--this I will not be quoting word for word--concerning dredging in Perdido Bay. If I am not mistaken, it was the recommendation that there be no dredging in Perdido Bay, and I believe that was one of the recommendations from both sessions of the conference.

MR. WHITE: No construction dredging, this is correct.

MRS. ALLEN: This is not being enforced and I don't know, since we are in State waterways--well, I am mainly concerned with that on the Alabama side--

MR. WHITE: May I clarify something? I mean we excluded maintenance dredging. Are you sure that--

MRS. ALLEN: Well, Mr. White, I don't know how you classify maintenance dredging, but when I see someone go off Perdido Bay with a dredge and make a canal, I personally don't call this maintenance dredging.

MR. WHITE: How many cases are you aware of that something like this happened?

MRS. ALLEN: Well, the dredge stays in Perdido Bay almost constantly. One came to me just a week ago wanting to know if I wanted sand pumped up on my beach, which apparently this is common procedure, I guess, sir.

MR. TRAINA: Mrs. Allen, there is a major distinction in the law regarding our involvement and the involvement of the Corps of Engineers. First the construction dredging, which is new, as you say, new canal. Now, if that is the case, a permit has to be granted if this is in the inland waterway by the Corps of Engineers and by arrangement through us and the Corps of Engineers we review that. However, this conference has recommended that there be no such dredging.

Now, with regard to maintenance dredging, which is the dredging of existing canals, we have recommended that such dredging be done under certain procedures and the spoil from that dredging be put in certain selected areas. Now, here again the Corps of Engineers is the main Federal agency that is involved.

So if there is a violation of this, if you are saying that people are going out either dredging for new construction or dredging for maintenance--

MRS. ALLEN: I refer to one right south of Lillian Bridge on the Alabama side--

MR. TRAINA: May I suggest to you that we will handle it from our end, but why don't you get in touch with the Corps of Engineers and we will also ask, request them if they know of any of this, because this is of great concern to us in this area.

MRS. ALLEN: The reason I brought this up, Mr. Traina, is I have not been too successful in the past.

MR. WHITE: Let me make a point on this dredging, Mrs. Allen.

Of course the recommendation alluded to this moratorium until a shoreline development plant is developed. I do think that the conferees are going to have to address themselves to the wording of this particular provision, because it is--no results are forthcoming with respect to a plan and it is not a workable proposal, in my opinion.

I don't know what the other--I mean I am saying this and the other conferees have their opinion. And I do think an undue hardship could conceivably be worked with respect to this and we have got to study this particular recommendation carefully and we will possibly make a revised recommendation on it.

MRS. ALLEN: I do not want any hardship to be put on anyone personally, I don't, but I do feel that something has got to be done. I have even seen it be done on a very small bayou near me where someone has just done for their boat.

MR. TRAINA: Pardon me, have you notified any State or Federal authorities when this is done?

MRS. ALLEN: Mr. Traina, this is a long story and if we had the opportunity I would tell you my experiences with the Corps of Engineers. (Laughter.)

MR. WHITE: Mr. Mauriello has a comment.

MR. MAURIELLO: Just a comment, Mrs. Allen.

With the new Federal regulations, the State agencies now have to certify each dredge and fill project prior to it even going to the Corps of Engineers for permits. Now, our office does get involved in the certification of projects within Florida. To my knowledge, we had not certified any projects for Perdido Bay for the Florida side. Basically what I am saying is that the water quality agencies of the States now have to certify a project even before it goes to the Corps of Engineers and we have put a moratorium on any certifications.

Now, if there is an activity on the Florida side, Mr. Doherty can check his files right quickly to find out if we have even issued a certification for it.

MRS. ALLEN: Thank you. I was mainly speaking about Alabama. I am a little more familiar--

MR. WHITE: Mr. Crockett, do you have something?

MR. CROCKETT: I can say the same thing. Of course the Alabama Water Improvement Commission must certify any application to the Corps of Engineers for a dredging activity or a similar activity which may possibly affect water quality. We had one application that I can recall for dredging on the Alabama side and it was not certified.

If an application comes to us for maintenance dredging, and that is when someone has a boat channel up to his pier or wall and it becomes filled with sand, that we in all probability under the present conclusions of this conference would certify it to the Corps of Engineers, certify or make known our intent to certify to the Corps of Engineers, subject to public notice and opportunity for public comment.

MRS. ALLEN: Thank you, sir.

Am I out of order, Mr. Chairman, to ask that there be some status or progress report concerning some of the wastes coming from the State of Alabama into Perdido Bay?

MR. WHITE: No, you can ask--you are asking--

MRS. ALLEN: I am asking since--

MR. WHITE: --that we address the question?

MRS. ALLEN: I would like to see somehow that some of this be included in some of the Federal studies or reports. I am very concerned over Rock and Hollinger Creek, I am on record as being very concerned over Rock and Hollinger Creek's being classified for waste transportation only, and--

MR. WHITE: Mr. Traina, I believe, can respond.

MR. TRAINA: Joe, do you want to respond to this?

MR. CROCKETT: I think I have written you on previous occasions, Mrs. Allen, concerning not only the status of the Alabama municipalities within the Perdido watershed and concerning the classification of the two streams that you mentioned. Offhand I cannot recall the mileage of Rock Creek that is so classified. Rock Creek is hardly more than a drainage ditch with very small flow, but I think it is about three miles.

Rock Creek, if my memory serves me correctly, goes into Blackwater Creek, which is classified for fish and wildlife.

In reference to Hollinger Creek, Hollinger Creek heads in the city of Bay Minette. Waste from the city practically makes a flow. And there again for the number of miles that Rock Creek is classified for waste transportation I do not recall--did I say Rock? I should have said Hollinger--but it is somewhere around six miles, subject to correction.

Then Hollinger Creek, though, flows into Styx River and the remainder of Hollinger Creek is classified for fish and wildlife as is Styx River. So we are not talking about the full length of streams, but small segments, that in order to remove that classification we will simply have to take these communities off the map.

MRS. ALLEN: I do not understand, Mr. Crockett.

I would like to ask, Mr. Chairman, the status of the city of Bay Minette and Tenneco Chemical Company.

MR. WHITE: I will call on Mr. Crockett for response to this too.

MR. CROCKETT: The status of Bay Minette is that they have applied to the Water Improvement Commission for a grant to construct sewage treatment facilities. The latest information I had before I left the office was that plans and specifications for construction of this project would be in by January 31.

In relation to the Tenneco project I would like to ask Mr. Bolton, if he will, to come forward and answer your question with that respect.

MR. WHITE: Let's go off the record just a minute.

(Off the record.)

MR. WHITE: Let's go back on the record, please.

MR. BOLTON: I am not sure that I can give all of the information specifically to the satisfaction of Mrs. Allen, but I shall make every effort to do so.

Tenneco Chemical Company was ordered by the Alabama Water Improvement Commission to correct its pollution problem sometime in 1968. Treatment facilities were completed in 1970. These facilities are pictured in a biannual report that we have just published that I would refer to as appearing on pages 38 and 39. We have determined since these facilities were completed and placed into operation that they need further refinements and have ordered the company to submit a plan to do so.

This company has employed one of the leading firms in the country to design these improvements and we have just in the last week received plans and specifications for this. According to the plan of implementation, these improvements will be completed within 4 to 6 weeks of approval by members of our staff. We received them, as you can see, on January 20.

So this is the status of Tenneco Chemical.

MRS. ALLEN: I guess we have all been dragging our feet, Mr. Chairman, including myself.

MR. WHITE: Mrs. Allen, I would love to be able to wave a wand and say that everybody would achieve compliance with everything we recommend immediately, but unfortunately some of these things do take time.

MRS. ALLEN: That would be too easy.

I would like to ask Mr. Crockett something concerning the city of Bay Minette.

In a letter dated March 24, 1969, to me it states:

> The city has received an advance of planning funds through the Housing and Urban Development Administration and is presently engaged in preparing plans for necessary treatment facilities.

I would like to know what happened to that plan and was it completed and why wasn't action taken before this?

MR. WHITE: Mr. Crockett.

MR. CROCKETT: The final plans and specifications I referred to a few minutes ago, my latest information says that they will be in by the end of this month, is a culmination of that study project. In other words, they made an application to Housing and Urban Development for an advance of planning funds. It takes time to get that through. Then the preparation of advanced planning must be followed by final planning and the actual construction drawings and specifications. It sometimes takes the length of time that we have seen to get one of these projects off board.

MR. TRAINA: Mr. Crockett, do you have a completion date for that project?

MR. CROCKETT: Not in my mind. I don't have it in the record here.

MR. WHITE: Well, could we get you to submit within 15 days something for the record on this, Mr. Crockett?

MR. CROCKETT: Yes, you could.

MR. WHITE: Fine, thank you.

MRS. ALLEN: I would also like to ask EPA to do us--I hate to say another study--but check the bottoms of Perdido Bay south of Lillian Bridge. I would like to know the condition of the--if you are in the area and making any tests I would like--I believe Mr. Walker mentioned this this morning, we would like to know how far down the bottom is dead.

MR. WHITE: Well, Mr. Traina, do you--well, before you respond.

We will have to assess everything that has come forward here with respect to demands on our time. I don't know that we will be in a position to make a commitment at this time. Mr. Traina might wish to respond further to this.

MR. TRAINA: Well, Mrs. Allen, I think we indicated a commitment here to this treatment plant investigation at St. Regis. As I indicated, part of that we will be looking at the effluent of the plant.

When you say the bottom, there are many things that come to mind. For instance, you could be talking about characterizing the chemical nature of bottoms, which is a very exhaustive, a very expensive procedure. You could be talking about looking at the biological forms of the bottom, which is in many cases an imprecise procedure which you have to compare it to something.

To just go in and look at the bottom, we need to define that.

MRS. ALLEN: I am a lay citizen, Mr. Traina--

MR. TRAINA: Yes, I realize that, and this is why I am saying, just to say--I could very easily say, sure, we are going to look at the bottom, but really that is not going to mean much.

MRS. ALLEN: I would just like to ask for the tests which would be helpful to the fishermen. They are all complaining about the lack of fauna in Perdido Bay, the lack of fish in Perdido Bay, the lack of crabs in Perdido Bay, and as a lay citizen I would assume that maybe something is on the bottom that is causing this change. I do not know.

MR. TRAINA: Well, to get into that, to get into the whole food chain mechanism is a rather extensive and very expensive kind of study, and I am not in any position to tell you or anyone else, for that matter, that, you know, we can commit those kinds of funds. This is a very--it is just a costly thing to get into this whole food chain mechanism involving the fishing resource of Perdido Bay, and really, unless--well, I just can't make that kind of commitment. I wish I could, but I can't.

MRS. ALLEN: I am grateful for the thousands of tax dollars you all have spent on Perdido Bay, believe me.

MR. TRAINA: We have been in this area, as you know.

MRS. ALLEN: I am grateful for it.

MR. TRAINA: But the thing you are asking is really beyond our resources at this time and I would be less than honest to say otherwise.

MRS. ALLEN: Maybe St. Regis Paper Company would have that in their report which they would be willing to give us.

MR. TRAINA: You know, I guess you are asking--

MR. WHITE: That is--

MRS. ALLEN: I will contact the St. Regis Paper Company, thank you.

MR. WHITE: All right.

MRS. ALLEN: I am sorry to have taken so much of your time, but it looks like I am a lone musketeer here from the State of Alabama. I guess it would have been more enjoyable had there been more people asking all these questions.

But thank you very much.

MR. WHITE: Thank you, Mrs. Allen.

Mr. Mauriello, do we have any other?

MR. MAURIELLO: I have--

MR. CROCKETT: Pardon me.

MR. WHITE: Mr. Crockett.

MR. CROCKETT: May I make a comment?

MR. WHITE: Please.

MR. CROCKETT: Mrs. Allen asked for the schedule for construction for Bay Minette. I was just informed that that schedule is in the implementation plan on file in your office. Would that not suffice?

MR. TRAINA: Yes.

MR. WHITE: Yes, that will be sufficient, Mr. Crockett.

MRS. ALLEN: Excuse me, I think in the beginning I asked if I may call somebody up. If I weren't a lay citizen I wouldn't have forgotten it, and if it is too late for me to do it, may I ask Mr. Crockett to do it, please?

MR. WHITE: Let's go off the record just a minute.

(Off the record.)

MR. WHITE: Let's go back on the record.

Mr. Crockett, do you have a comment?

MR. CROCKETT: I thought we were off the record. Are we still off the record?

MR. WHITE: We are back on the record.

We will recess for 10 minutes.

(RECESS)

MR. WHITE: Let's go back in session, please.

I believe we have two more people that have indicated they want to speak.

MR. MAURIELLO: Mrs. Guice would like to make a presentation.

Is Mrs. Guice here? She was just a moment ago.

Environmental Protection Agency
Progress Meeting on Perdido Bay
Gulf Breeze, Florida
January 26, 1972

I ask that this, the final statement of Jo Ann Allen, representing the Perdido River Basin Anti-Pollution Association, be placed into the record of the January 26, 1972 Environmental Protection Agency Progress Meeting on Perdido Bay.

The above Association requests that all information and results concerning the Federal Water Pollution Control Administration Class V Grant (Project Number 12040 EJU) awarded the St. Regis Paper Company on June 25, 1969, for the eligible Grant period costs of $1,461,562, be made available to this Association.

The Association further requests detailed information concerning the June 29, 1971 application by St. Regis Paper Company for a Discharge Permit from the Secretary of the Army. Has this Discharge Permit been granted?

The Association also requests that ALL discharges from the St. Regis Paper Company, which endanger the health and welfare of the area citizens, be halted by January 1, 1973--without extension!!!

Further, the Association requests that the excessive sludge deposits attributed to discharges from the St. Regis Paper Company, be removed from Eleven Mile Creek, Perdido River, Perdido Bay, and any other tributaries so affected. The Association requests that these sludge deposits be removed by the St. Regis Paper Company, without delay!

Finally, the Association urges immediate enforcement of ALL State of Alabama and Federal Clean Air and Water Pollution Control Acts concerning interstate waters. The Association requests that under NO circumstances

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Environmental Protection Agency
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January 26, 1972
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shall an extension of time be granted the St. Regis Paper Company.

The Perdido River Basin Anti-Pollution Association appreciates the opportunity to have been a participant in the recently concluded Environmental Protection Agency Progress Meeting held at Gulf Breeze, Florida.

Thank you,

Jo Ann Allen
Star Route Box [illegible]5
Lillian, Alabama 36549

cc: Attorney General
State of Alabama

Environmental Defense Fund

Mr. Albert P. Elebash

Mr. Paul Corwin

Here she is. If you are ready, Mrs. Guice.

MRS. J. J. GUICE

UNITED CITIZENS AGAINST POLLUTION

GULF BREEZE, FLORIDA

MRS. GUICE: Mr. Chairman.

You have heard how it is again and now I am going to show you how it is again.

...Slides...

This was St. Regis outfall at King Field Road last year this time in January.

Would you change that, please.

Go ahead. Some more of our outfall.

Some more of it.

Same month.

This is a condition I found last January, 1971, on Kings Field Road.

Go ahead.

MR. WHITE: Are you going to identify what they depict as you go?

MRS. GUICE: I will, if you would like, in writing, but if you don't know--

MR. WHITE: If you are just going to flip through rapidly and then just talk--

MRS.GUICE: I was trying to hurry it up for you.

I don't know the ingredients, but I know it is a lot of foam.

MR. WHITE: Again to keep it straight, are you going to submit us a copy of these for the record?

MRS. GUICE: Yes, I am.

MR. WHITE: Again, can these be as exhibit to the official transcript and not reproduced?

MRS. GUICE: Yes. Yes.

MR. WHITE: We can't reproduce them in color, if that is satisfactory with you.

MRS. GUICE: Yes, that would be fine.

MR. WHITE: All right, thank you.

(The above-mentioned Exhibit, marked Exhibit 3, is on file at the office of the Environmental Protection Agency, Region IV, Atlanta, Georgia.)

MRS. GUICE: I found that anything they could obtain to throw into the water, they did it to slow their flowing process down, would seem to slow the foaming down.

And this is the--I was told it was Eleven Mile Creek after this material was turned loose in it and the water is terribly dirty there.

The same little creek.

MR. TRAINA: These are all last year?

MRS. GUICE: These were taken in January 1971.

MR. TRAINA: O. K.

MRS. GUICE: And I will get to more in a minute.

MR. TRAINA: O. K.

MRS. GUICE: Now, this is what I took September 10, 1971, from the air. This is all their holding ponds and their complete process.

And I guess you saw that smoke there.

I was told that was against the law.

O. K., go ahead, please.

Now, this is their holding ponds. What kind of process, I don't know.

And this is something that didn't look too good to me over on the side.

This is their outfall from the air and this is just to the north side of Kings Field Road.

This is going under the bridge there on Kings Field Road.

And this was taken a couple, three days later.

MR. TRAINA: Excuse me, are these in September?

MRS. GUICE: Yes, 1971.

The same month just a few days later.

Same month, late in the afternoon. I keep checking on these people because I find a difference in the type of foam that comes down through there, the amount in the outfall.

And this was taken September--not September, but January 10 this year. Now, I am that lady from St. Regis that you have been looking for, I am the one that took Ed Sisson there from Channel 10 and exposed this to the news media.

Go ahead, please.

I see an awful lot of erosion there that shouldn't be going on.

MR. TRAINA: Where is this?

MRS. GUICE: This is the same place except the opposite wing. It is in the opposite direction. It is by Kings Field Road. That is the opposite side of the holding pond. You can see where some filter has been put in there.

This was the same date.

Same day.

MR. TRAINA: Excuse me. Now, would you locate these series of films? Is this at the discharge point of Eleven Mile Creek?

MRS. GUICE: Yes, sir.

MR. TRAINA: O. K.

MRS. GUICE: That is where Kings Field Road is.

MR. TRAINA: O. K.

MRS. GUICE: Same area.

Same area.

And I went back a few days later, I can't remember exactly how many days later, and I found this outfall working for the first time.

And then proceed, please.

That was looking down under the bridge at all the material they have thrown down or someone has thrown down that seemed to slow the flow down.

Proceed, please.

And this is the exact way that outfall looked the day that Ed was there and did the movie of it.

Proceed, please.

In fact, these were taken the day--I was with him the day he did that movie and these were taken that day.

I was on the bridge when I did this one.

Same outfall.

Proceed, please.

This is the way the creek looks or did the last time I was out there, which was about three weeks ago.

MR. WHITE: Where was that taken?

MRS. GUICE: That is the same--that is on the opposite side of the bridge from the outfall. I was told that was Eleven Mile Creek, by some of the officials in the Environmental Protection Agency.

Proceed, please.

This is the way it looked the last time I was out there, which was about three weeks ago, I think. They had the outfall slowed down very, very, very slow with this little opening going that I told you about earlier, the valves seemed to be open in the dam and the flow coming through there.

But the creek still looks this way.

Now, this is the way it looks down at I-10 Bridge or this is the way it looked last January at I-10 Bridge, excuse me.

Proceed, please.

And this is the way it looks today at I-10 Bridge, so maybe by some rare chance they are doing something, because it does look better.

...End of slides...

Now, I have a few things I want to say.

I am sorry that Mr. Levin is not here, because when he makes his decisions--

MR. WHITE: Let me interject something here and I didn't say this before. Mr. Levin had a commitment to make. He had to leave and asked me to express his concern for him.

MRS. GUICE: I would like to compliment St. Regis on at least putting their effluent out in the open where you can see it. They don't put it underground like a lot of other industries do.

And I would also like to say please, if you find anything that you think needs to be reported about the environment, call 932-5323. That is your Air & Water Pollution office, the local office. Or write 1384 Shoreline Drive, Gulf Breeze, Florida. That is 32561.

And another statement I would like to make today to go on record is that I have checked up and approximately 30,000 citizens of Santa Rosa and Escambia County, not counting the ones in Alabama, that is with industry and the population of Santa Rosa and Escambia County is approximately 30,000, and I cannot see for the life of me why we should suffer mentally, physically and otherwise because of pollution. I just--this doesn't make common sense to me. I came here before industry and I am looking for another place to move and I know a lot of people that have moved away because of it and I know a lot of tourists that are turning their backs on this area. Now, we must do something and do it today. We can't keep waiting.

I think all of us should cooperate and work together, not one industry go in one direction and one the other direction. I think you should put your heads together, all you scientists should get together. You can learn from each other. And I think that St. Regis is forgetting about those 200 commercial fishermen that are out of business when they are talking about some of their people that might be laid off if they do so-and-so to help with pollution.

Oh, and by the way, you might be interested to know that the city of Pensacola is dumping some of their sewage into that Bayou Marcus. I think if you will check on that you will find it to be true.

MR. WHITE: This was explored earlier and the conferees are aware of it.

MRS. GUICE: I wrote this note when Mr. Adams was talking.

And we are forgetting about the operators and owners of fish camps. I know one couple that has a lease on a fish camp, they have not told me for how many years, and man and wife have had to go to work to pay the lease on the camp. It is no good to him. In fact he has closed it up. These are the people that are really hurting.

I feel that if employees of these different companies had to be laid off they could be sent to another city where they have--like St. Regis has 19 places in the State of Florida, so why couldn't they just be transferred to another plant.

Thank you for listening to me.

MR. WHITE: Thank you, Mrs. Guice.

Are there any comments by any of the conferees?

If not, thank you.

Mr. Mauriello, do we have another speaker?

MR. MAURIELLO: I have no one else listed. Is there anyone else who wishes to speak?

MR. WHITE: Well, some gentleman, I believe, indicated earlier that he might wish to come back and make a statement.

MRS. GUICE: Excuse me, I forgot these pictures that I have here. I have some black and white and also some color, if you would like them for your files.

MR. WHITE: What pictures are those?

MRS. GUICE: The ones that were taken of foam on

Perdido Bay and their St. Regis outfall as of today and October 30, 1971.

MR. WHITE: Could we just have those for our information and if it is all right with you we won't put it in the record?

MRS. GUICE: You sure can.

MR. WHITE: Mr. Crockett, I believe you indicated that you had someone else?

MR. CROCKETT: Mr. Edgar Hughes, Marine Biologist, Alabama Department of Conservation, stationed on Dauphin Island, who spoke earlier this morning, asked that he be given an opportunity to again appear before the conferees and make a statement.

EDGAR A. HUGHES, MARINE BIOLOGIST
ALABAMA DEPARTMENT OF CONSERVATION AND
NATURAL RESOURCES, MARINE RESOURCES DIVISION
DAUPHIN ISLAND, ALABAMA

MR. HUGHES: Thank you, Mr. Crockett.

Mr. Chairman, I would like to first say off the record that I spent the better two-thirds of my 34 years--

MR. WHITE: You are on the record. Do you have any objection to going ahead with your statement?

MR. HUGHES: No, sir. I was going to say I lived the better two-thirds of my 34 years on the coast of Mississippi, Alabama and northwest Florida, and I formerly worked for the Mississippi State Game and Fish Commission as a graduate assistant,in which it was my job to go out and sample effluent, sample water from some of the paper companies.

And I would like to say that I was called to go to Perdido Bay this past Monday to make a personal observation of the bay and of the water as it came into the bay from Eleven Mile Creek. So very briefly I would just like to say that I left I believe it is Ann Black's camp about 1 o'clock, a little after 1, on Monday afternoon and the water was a little choppy. As I went across the bay I noted that the whole bay had the appearance somewhat of a thick meshed net. In fact, the choppiness caused the net to be broken up into furrows, it appeared, furrows of white lace. It was not like the pictures of foam we saw here, but instead it was covered and made more or less a lattice work.

I went on over to Eleven Mile Creek and motored up there with a boat and at this particular location I didn't see too much foam. It was not until I turned around that I noted in my wake that there just seemed like a long stream of this residual foam in the wake of the boat. And also I noted that the water had this terrible coffee brown color.

I had a sample bottle and I said, well, I would like to see what this looks like in the lab, so I took a sample of the water and went back with the water refrigerated and checked it for turbidity, as I have many samples in my work lately, and I found that the turbidity reading was better than twice what acceptable standards should be in similar waters in Alabama.

And I would just like to make that statement. Mrs. Allen asked that I do that.

MR. WHITE: Where was the sample taken?

MR. HUGHES: The sample was taken from the mouth of the Eleven Mile Creek.

MR. WHITE: Did you have any other samples above and below?

MR. HUGHES: No, sir. I took this one out of personal interest because I just wanted to see for myself what sort of turbidity reading it would give me now.

MR. TRAINA: What was the reading?

MR. HUGHES: 137 Jackson Turbidity Units, approximately.

MR. TRAINA: Thank you.

MR. WHITE: Any other comments or questions?

Did you have another statement, Mr. Hughes?

MR. HUGHES: No, sir.

MR. WHITE: Let's go off the record a minute.

(Off the record.)

MR. WHITE: Let's go back on the record, please.

Well, I would like to thank all of you for coming today, the participants and the attendees who just sat here and listened with us.

We will retire now and sometime later this evening go into executive session and consider some revised conclusions and recommendations. We will come back in the morning at 9:30 to make these public.

We stand recessed until in the morning at 9:30.

(Whereupon, at 4:45 o'clock an adjournment was taken until 9:30 o'clock, Thursday, January 27, 1972.)

THURSDAY, JANUARY 27, 1972

(9:30 o'clock)

MR. WHITE: Let's go back in session, please.

The conferees met in executive session late yesterday evening and unanimously agreed on some revised conclusions and recommendations, which I will read now.

Based on evidence and testimony presented at the progress meeting, the conferees have arrived at the following revised conclusions and recommendations:

Conclusions.

1. St. Regis Paper Company is to be commended for its efforts in reducing 5-day BOD loading requirements established by the conferees at the second session of the conference.

2. The conferees recognize the progress made by the St. Regis Paper Company to reduce carbonaceous material and color through its research project on wastewater renovation. However, bleachery wastes which are a major source of carbonaceous material and color, have not received adequate consideration in its abatement studies.

3. The city of Pensacola and Escambia County, by adopting a 5-year master plan, have made some progress toward consolidation of the sewage treatment facilities on Bayou Marcus. However, litigation concerning the constitutionality of a city-county merger has impeded the overall consolidation

program. Because of this delay, the conferees have decided that further action must be taken with respect to the facilities currently discharging to Bayou Marcus.

4. Previous recommendations requiring the development of a shoreline plan before permitting any dredging in the bay have been ineffective due to the lack of response by local governmental officials.

5. The effect of St. Regis Paper Company's in-plant changes and installation of additional treatment units on the reduction of foam-causing constituents, carbonaceous materials, and color has not been determined.

Recommendations.

1. The St. Regis Paper Company shall not discharge more than 5,100 pounds per day of 5-day BOD to Eleven Mile Creek. If further investigations show this to be excessive, the company will be required to further reduce its waste discharge.

2. St. Regis Paper Company shall reduce carbonaceous organic materials and color to the maximum feasible degree. Special emphasis shall be placed upon the reduction of these materials in the bleachery wastes. Upon the completion of its current pilot plant studies, the St. Regis Paper Company shall submit its recommendations for the reduction of carbonaceous organic materials and color in mill wastes to the conferees by

August 1, 1972. Also, the St. Regis Paper Company shall submit a further progress report to the conferees by February 15, 1973, concerning the application of its present wastewater renovation research project to the Cantonment mill.

3. The State of Florida shall take immediate action to ensure that sewage treatment plants discharging to Bayou Marcus are in full compliance with previous conference recommendations and State water quality standards. A status report shall be submitted by the State of Florida by February 15, 1972. The city of Pensacola and the County Commissioners of Escambia County shall provide the conferees a status report of their actions in regard to regionalization of the Bayou Marcus area by July 1, 1972.

4. No further construction and maintenance dredging shall be permitted in Perdido Bay without prior approval of the Environmental Protection Agency and the State having jurisdiction over the project. Any dredging shall be by hydraulic or hopper dredge. Disposal of all dredged spoils shall be in a manner and to spoil sites acceptable to the conferees.

5. The Environmental Protection Agency and the State of Florida technical staffs shall schedule an in-plant investigation of treatment processes and other pollution control measures employed by the St. Regis Paper Company to determine

waste reductions being achieved by the company and effects upon the receiving waters. Special attention shall be directed to the extent of the reduction of foam-causing constituents resulting from in-plant process changes and the installation of the secondary treatment system. A report of such investigations shall be made to the conferees as soon as possible, but not later than August 1, 1972. These investigations are not in lieu of continued efforts by the company to effect the results as outlined in the applicable recommendations above. In addition, any other waste discharges into Perdido Bay or its tributaries shall be reported on with recommendations for abatement.

This concludes the recommendations.

I should point out that the other conferees all had business elsewhere and had to leave and they asked me to express their regrets and their thanks to all of you who attended and participated.

I will call on Mr. Crockett now to see if he has any comment.

MR. CROCKETT: No comment.

MR. WHITE: Yes, please.

FROM THE AUDIENCE: John, I just wanted to ask--

MR. WHITE: Let's go off the record just a minute.

(Off the record.)

MR. WHITE: Back on the record.

Thanks again. We stand adjourned.

(Whereupon, at 9:35 o'clock the progress meeting was adjourned.)